

DOCUMENTS RELATING TO CONTAMINATION OF
ATLANTIC STEEL COMPANY PROPERTY BY
NATIONAL SMELTING AND REFINING SITE

TAB 1 February 15, 1991 - Law Environmental Laboratory Data
Reports for Pond Sediment Sampling

TAB 2 City of Atlanta File Contents - Industrial Sampling
Data Sheets - 1972-1983

TAB 3 City of Atlanta File Contents - Correspondence
(Indexed)

2/1/72 City correspondence to Sams re pH results from
1/31/72 grab samples

2/22/72 City correspondence to N.L. re 2/15/72 site
visit; damage to sewer resulting from low pH
effluent

3/7/72 N.L. correspondence to City re investigation of
illegal discharges and sewer damage allegations

4/3/72 City correspondence to N.L. re repairs to storm
sewer

6/7/72 N.L. correspondence to City re denial of
responsibility for repair of storm sewer

6/23/72 City correspondence to N.L. reiterating N.L.'s
responsibility for repair of storm sewer

7/3/72 N.L. correspondence to City re development of
neutralizing system for waste water

8/17/72 City memorandum to file re meeting with N.L. and
review of facts establishing responsibility for
sewer repair

11/16/77 City memorandum to file re low pH discharges by
N.L. and re sewer damage

11/21/77 City letter to N.L. re low pH discharges

12/16/77 City letter to N.L. re continuing low pH
discharges



10677802

2/2/78 N.L. letter to City re schedule for construction of improvements to waste water treatment systems and runoff collection

2/27/78 N.L. letter to city re schedule for completion of work

3/6/78 Georgia DNR letter to N.L. re low pH and high lead

4/6/78 City letter to Southern Railway re ownership of sewer which was repaired on emergency basis in 1972

4/27/78 Georgia DNR letter to N.L. re low pH and high lead discharges from N.L. from 2/9/78 sampling

5/3/78 City letter to N.L. re discharges of high lead levels into southwest sewer

5/15/78 N.L. letter to DNR re plans for upgrading waste water collection and treatment system

5/18/78 N.L. letter to City re plans for acid treatment system

8/18/78 Georgia DNR letter to N.L. re receipt of flow diagrams and absence of reference to lead discharges

12/14/78 N.L. letter to City re application of Industrial Sewer Connection

12/21/82 City memorandum to file re N.L. site spill of ammonia and damage to sewer line

11/17/83 City letter to National Smelting re sample results from discharge to sewer

12/15/83 City letter to National Smelting re high lead discharges

1/3/84 Lake Engineering and Development letter to City re high lead levels in samples. Sludge spilled into the sewer

1/10/84 City letter to National Smelting re information request regarding sludge removal procedures

2/1/85 City letter to National Smelting re proposed
waste water discharge permit

2/15/85 National Smelting letter to City re comments on
proposed waste water discharge permit

2/25/85 City letter to National Smelting re rejection of
National Smelting's comments on proposed permit

U.S. EPA REGION IV

SDMS

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LAW ENVIRONMENTAL, INC.

112 TOWNPARK DRIVE
KENNESAW, GEORGIA 30144-5599
404-421-3400

February 15, 1991

Alston & Bird
One Atlantic Center
1201 West Peachtree Street
Atlanta, Georgia 30309

Attention: Mr. Robert D. Mowrey

Subject: Laboratory Data Reports for Pond Sediment Sampling
Atlantic Steel Facility
Atlanta, Georgia
Law Environmental Job No. 55-0765

Dear Mr. Mowrey:

Law Environmental is pleased to present the results of sampling and analysis of sediments from the middle pond at the Atlantic Steel Site. This letter presents a brief description of the field work, analytical results, and conclusions. These services were part of a scope of work outlined in our Proposal Number 55-0364. The work was authorized by Mr. C.A. Harmon in a meeting with Law Environmental personnel on February 7, 1991.

These activities were conducted to assess the potential for migration of contaminated runoff from the National Smelting and Refining Industries (NSRI) site to the Atlantic Steel lower pond.

Pond sediments were sampled on February 7, 1990 and analyzed for total lead (EPA method 7420). Results of sampling in the lower pond were reported in a letter to you dated February 5, 1991.



FIELD WORK

Three samples (SS-11 through SS-13) were collected from the middle pond near the outlet to the lower pond (see Figure 1). The samples were collected by wading into the pond and using a 5-foot long sampling device with a plastic insert. The sampler was driven into the pond sediment and slowly removed. The amount of recovery ranged from 0.5 to 2.0 feet.

At each sampling location, the recovered pond sediment sample was placed in a stainless steel bowl, mixed, and then placed in an appropriate sample container. The samples were placed in a laboratory sample shipper and transported under chain-of-custody to Law Environmental National Laboratory in Kennesaw, Georgia for laboratory analyses.

RESULTS OF THE ANALYSES

Laboratory results from the sampling event are provided in the attached laboratory data report. Concentrations of total lead from this sampling event and two prior sampling events from the lower pond are summarized below in milligrams per kilogram (mg/kg).

<u>Sample No.</u>	<u>Lead, Total (mg/kg)</u>
Power Pond	
SS-2	2200
SS-3	1900
SS-4	2400
SS-5	1000
SS-7	560
SS-8	3300
SS-9	540
SS-10	150
Middle Pond	
SS-11	40
SS-12	270
SS-13	82

Mr. Bob Mowrey
February 15, 1991
Page 3



CONCLUSIONS

The laboratory results indicate lead levels in the sediments near the outlet of the middle pond are significantly lower than lead levels found in the lower pond. It is therefore unlikely that sediments in the middle pond have contributed to the elevated lead levels found in the lower pond. The most obvious source for elevated lead in the lower pond sediments is the storm drain that originates upgradient at/near the NSRI site.

We appreciate the opportunity to provide services to you on this project. If you should have any questions regarding this letter or the project in general, please call.

Sincerely,

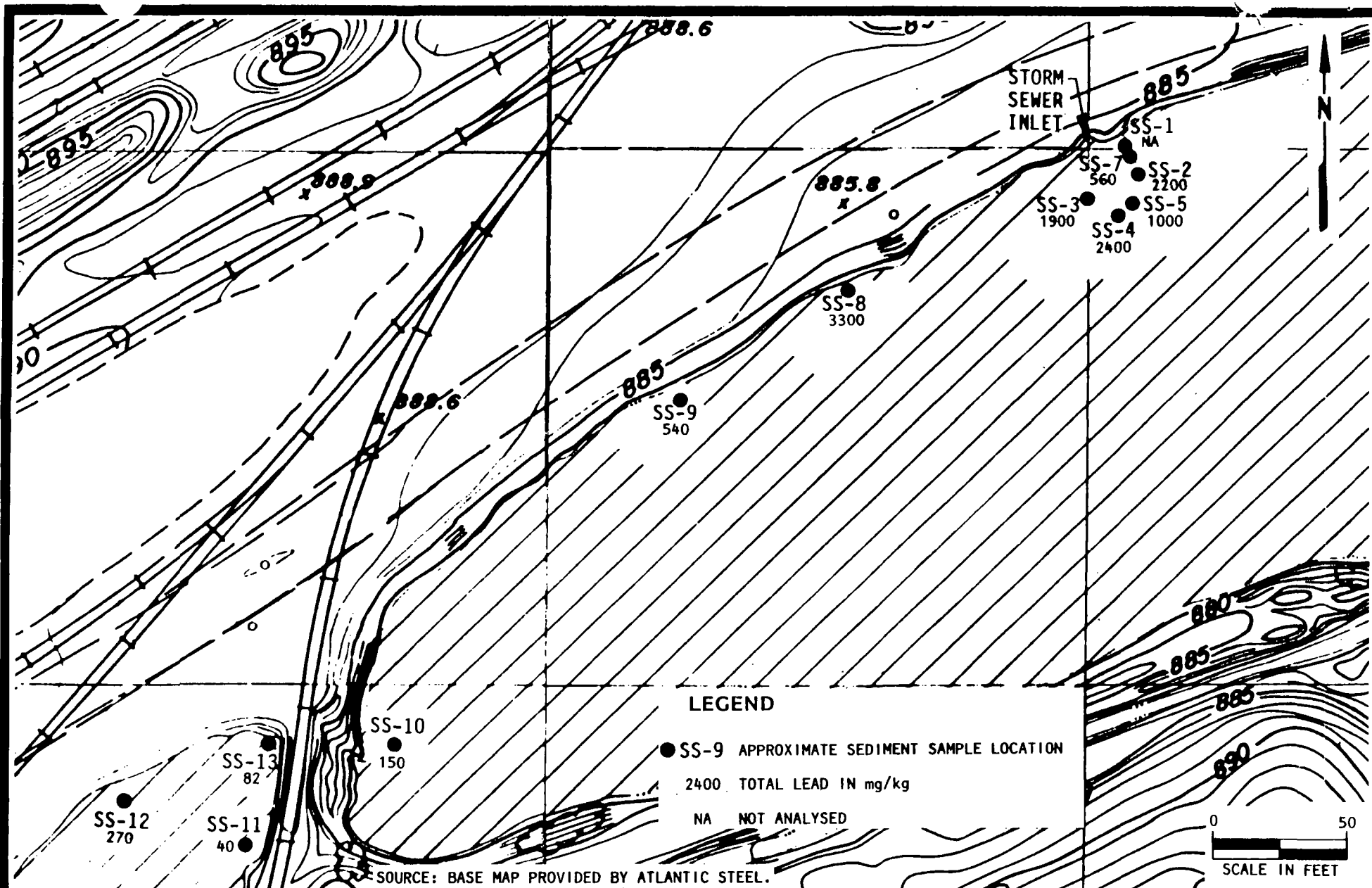
A handwritten signature in cursive script, reading "John M. Callahan". The signature is fluid and elegant, with the first letters of each word being capitalized and prominent.

John M. Callahan
Project Geologist

A handwritten signature in cursive script, reading "Larry A. Neal". The signature is fluid and elegant, with the first letters of each word being capitalized and prominent.

Larry A. Neal, P.E.
Principal/Environmental Engineer
Vice President

JMC/LAN;cjp



ALSTON & BIRD
ATLANTA, GEORGIA



LAW ENVIRONMENTAL INC.

MAP OF TOTAL LEAD
CONCENTRATIONS IN
SEDIMENT SAMPLES

JOB NO. 55-0765

FIGURE 1



LAW ENVIRONMENTAL, INC.

112 TOWNPARK DRIVE
KENNESAW, GEORGIA 30144-5599
404-421-3400

February 12, 1991

Law Environmental, Inc.
112 TownPark Drive
Kennesaw, GA 30144

Attention: John Callahan

LE Job Number: 55-0765.1

Subject: Chemical analysis of samples received on 02/08/91.

Dear Mr. Callahan:

Law Environmental National Laboratories has completed its analysis of your samples and reports the results on the following pages. These results relate only to the contents of the samples as submitted. This report shall not be reproduced except in full without the approval of Law Environmental National Laboratories.

If there are any questions, please do not hesitate to contact us.

Sincerely,

LAW ENVIRONMENTAL NATL LABS

Wendy A. McBride for

Clifford H. McBride
QC/Coordinator

Attachment: Data Report
Invoice

W ENVIRONMENTAL NATIONAL LABORATORIES
TEST DATA REPORT

Date 02/12/91

Page 1

--- Project Information ---

Lab Number : 91-7952-01
Project No. : 55-0765.01
Project Name : ATLANTIC STEEL

Cust. No. :

Manager: JOHN CALLAHAN

--- Sample Information ---

Station ID : SS-11
Matrix : SO
Type : GRAB
Collector : JMC

Sampled Date/Time : 02/08/91 13:02
Received Date/Time : 02/08/91 14:45
Received From/By : JMC/GP
Chain of Custody : 2341
Number of Containers : 1

Remarks :

--- Test Data ---

Parameter.....	Method....	Units	PQL.....	Results...	Test Date	Analy
-- INORGANIC CHEMISTRY RESULTS --						
Moisture (Oven Dried @ 105C)	EPA 160.3M %	1		84	02/11/91	GW
-- METALS ANALYSIS - METALS PREP RESULTS --						
Lead, Total	EPA 7420	mg/kg	10	40	02/12/91	DCE
--- SERIES 35000						
Total Metals Prep: Solid AA Flame	EPA 3050			N/A	02/11/91	BS

Signed

Wendy A. Wajda

W ENVIRONMENTAL NATIONAL LABOR JRIES
TEST DATA REPORT

Date 02/12/91

Page 1

--- Project Information ---

Lab Number : 91-7952-02
Project No. : 55-0765.01
Project Name : ATLANTIC STEEL

Cust. No. :

Manager: JOHN CALLAHAN

--- Sample Information ---

Station ID : SS-12
Matrix : SO
Type : GRAB
Collector : JMC

Sampled Date/Time : 02/08/91 13:30
Received Date/Time : 02/08/91 14:45
Received From/By : JMC/GP
Chain of Custody : 2341
Number of Containers : 1

Remarks :

--- Test Data ---

Parameter.....	Method....	Units	PQL.....	Results...	Test Date	Analy
-- INORGANIC CHEMISTRY RESULTS --						
Moisture (Oven Dried @ 105C)	EPA 160.3M %	1		82	02/11/91	GW
-- METALS ANALYSIS - METALS PREP RESULTS --						
Lead, Total	EPA 7420	mg/kg	10	270	02/12/91	DCE
--- SERIES 35000						
Total Metals Prep: Solid AA Flame	EPA 3050			N/A	02/11/91	BS

Signed

Wendy A. Webb

ENVIRONMENTAL NATIONAL LABORATORIES
TEST DATA REPORT

Date 02/12/91

Page 1

--- Project Information ---

Lab Number : 91-7952-03
Project No. : 55-0765.01
Project Name : ATLANTIC STEEL

Cust. No. :

Manager: JOHN CALLAHAN

--- Sample Information ---

Station ID : SS-13
Matrix : SO
Type : GRAB
Collector : JMC

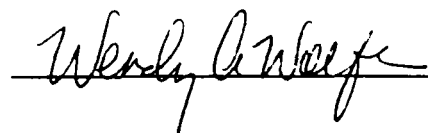
Sampled Date/Time : 02/08/91 13:50
Received Date/Time : 02/08/91 14:45
Received From/By : JMC/GP
Chain of Custody : 2341
Number of Containers : 1

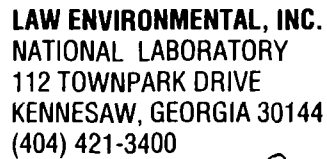
Remarks :

--- Test Data ---

Parameter.....	Method....	Units	PQL.....	Results...	Test Date	Analy
-- INORGANIC CHEMISTRY RESULTS --						
Moisture (Oven Dried @ 105C)	EPA 160.3M %	1		85	02/11/91	GW
-- METALS ANALYSIS - METALS PREP RESULTS --						
Lead, Total	EPA 7420	mg/kg	10	82	02/12/91	DCE
--- SERIES 35000						
Total Metals Prep: Solid AA Flame	EPA 3050			N/A	02/11/91	BS

Signed





234i

NAME OF FACILITY:
STREET ADDRESS:

[illegible]

DISTRIBUTION: ORIGINAL AND YELLOW COPIES ACCOMPANY SAMPLE SHIPMENT TO LABORATORY. PINK COPY RETAINED BY SAMPLERS. YELLOW COPY RETAINED BY LABORATORY.

REMARKS

Analyse for Total Lead

*SOURCE CODES

RECOVERY WELL - RW
RCRA MONITORING WELL - MW
SOIL / SEDIMENT - SO
SLUDGE - SL

NPDES DISCHARGE - ND
DRINKING WATER - DW
HAZARDOUS WASTE - HW
SURFACE WATER - SW
NON-AQUEOUS - NA

INDUSTRIAL SAMPLING DATA SHEET

STRY National Lead

DATE 2/16/72

NO. OF MLS PER % FLOW

SIZE LINE (in)

LOCATION OF SAMPLE POINT Eight out line at rear wall of plant

SAMPLED BY: 1st SHIFT M E Neil, checked by Ralph Harper

2nd SHIFT

3rd SHIFT
Jar No

[illegible]

NATIONAL LEAD

3/22/72

SAMPLES TAKEN AT GRATE

PH METER

PH METER AT SOUTH RIVER

0930 2.5

2.5

1000 2.6

2.3

1030 2.8

2.8

1100 2.9

2.8

1130 2.6

2.6

1200 2.9

2.8

1230 2.5

1300 2.8

2.8

1330 2.7

2.8

1400 3.0

2.9

1430 2.9

2.8

National Lead 3/2 3/12

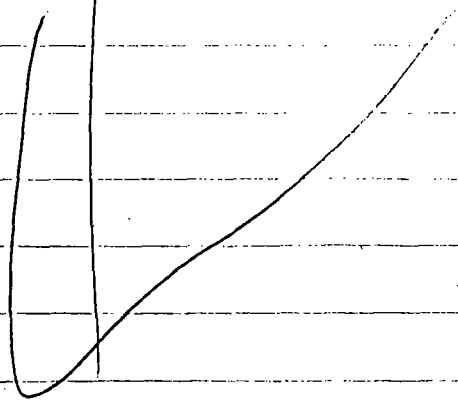
~~0900~~

Mefer in track

Parher

0900	3.1 clear	3.1
0930	3.3	3.2
1000	3.3	3.2
1030	3.4	3.3
1100	3.5	3.4
1130	3.4	3.4
1200	3.3	3.8

1300	3.2	3.1
1330	3.2	3.2
1400	3.3	3.4
1430	3.2	3.3
1500	3.2	3.4



CITY OF ATLANTA
PUBLIC WORKS DEPARTMENT
WATER POLLUTION CONTROL DIVISION
INDUSTRIAL WASTE SECTION

Industry National Lead Date 5/1/74
Time 10:15 AM Type Sample Grab Sample Point Holding tank effluent line

Analytical Data

SUSPENDED SOLIDS

Source of Sample					
Amount of Sample					
Crucible Number					
Wt. Dry (Cru. & Solids)					
Wt. Ig. (Cru. & Solids)					
Wt. of Crucible					
Total Solids in Grams					
Vol. Solids in Grams					
X Total Solids p.p.m.	40				
Vol. Solids p.p.m.					

Color					
Conductivity					
Temp. °F					
X pH	8.4				

5-DAY BIOCHEMICAL OXYGEN DEMAND

Dilution (%)					
Amount of Sample (Ml.)					
Bottle Number					
Immediate D.O.					
Bottle Number					
5-Day D.O.					
5-Day B.O.D. p.p.m.					

CHEMICAL OXYGEN DEMAND

Ml's of Sample					
Ml's of FeSO ₄ Used for Blank					
Ml's of FeSO ₄ Used for Sample					
Normality of FeSO ₄ (NH ₄) ₂ SO ₄					
Chemical Oxygen Demand Mg/l					

METALS (PARTS PER MILLION BY WEIGHT)

X Cadmium	1100				
X Chromium	0.20				
X Copper	2.85				
Cyanide					
X Nickel	2.25				
Silver					
Mn					
X Zinc	3.50				
Phenol					

Pb 0.52

CITY OF ATLANTA
BUREAU OF
WATER POLLUTION CONTROL
INDUSTRIAL WASTE

Company Name National Lead

S. I. C. No. 3444

Type Sample grab from pretreatment
effluent line

Date 6-17-76

SUSPENDED SOLIDS

Source of Sample					
Amount of Sample					
Crucible Number					
Wt. Dry (Cru. & Solids)					
Wt. Ig. (Cru. & Solids)					
Wt. of Crucible					
Total Solids in Grams					
Vol. Solids in Grams					
Total Solids p.p.m.					
Vol. Solids p.p.m.					

Color					
Conductivity					
Temp. °F					
X pH	9.6				

5-DAY BIOCHEMICAL OXYGEN DEMAND

Dilution (%)					
Amount of Sample (ML.)					
Bottle Number					
Immediate D.O.					
Bottle Number					
5-Day D.O.					
5-Day B.O.D.p.p.m.					

CHEMICAL OXYGEN DEMAND

MI's of Sample					
MI's of FeSO ₄ Used for Blank					
MI's of FeSO ₄ Used for Sample					
Normality of FeSO ₄ (NH ₄) ₂ SO ₄					
X Chemical Oxygen Demand Mg/l	274	251			

METALS (PARTS PER MILLION BY WEIGHT)

Cadmium					
Chromium					
Copper					
Cyanide					
Nickel					
Mercury					
X Zinc					
Phenol					
X Lead					

INDUSTRY

DATE _____

11-21-77

NO. OF MLS PER % FLOW

PH @ various pts. along flow.

SIZE LINE (in)

LOCATION OF SAMPLE POINT

SAMPLED BY: 1st SHIFT

ALLEN & JOE

2nd SHIFT

3rd SHIFT


COMMENTS:

STANDING FLOW REFERS TO FLOW ON GROUND.
READINGS ON FLOW IN PIPES THROUGH WALL: READS 0

INDUSTRIAL SAMPLING DATA SHEET

INDUSTRY Natural Lead DATE 11-23-77
 NO. OF MLS PER % FLOW Take Pb SIZE LINE (in) _____
 LOCATION OF SAMPLE POINT _____
 SAMPLED BY: 1st SHIFT Allen Franklin
 2nd SHIFT _____
 3rd SHIFT _____

TIME	FLOW (in)	REMARKS	TIME	FLOW (in)	REMARKS
11:00	Pb	11:00 5/8 to 1 stream	11:00	Pb	11:00 5/8 to 1 stream
11:10	Pb	11:10 5/8 to 1 stream	11:10	Pb	11:10 5/8 to 1 stream
11:20	Pb	11:20 5/8 to 1 stream	11:20	Pb	11:20 5/8 to 1 stream
11:30	Pb	11:30 5/8 to 1 stream	11:30	Pb	11:30 5/8 to 1 stream
11:40	Pb	11:40 5/8 to 1 stream	11:40	Pb	11:40 5/8 to 1 stream
11:50	Pb	11:50 5/8 to 1 stream	11:50	Pb	11:50 5/8 to 1 stream
12:00	Pb	12:00 5/8 to 1 stream	12:00	Pb	12:00 5/8 to 1 stream
12:10	Pb	12:10 5/8 to 1 stream	12:10	Pb	12:10 5/8 to 1 stream
12:20	Pb	12:20 5/8 to 1 stream	12:20	Pb	12:20 5/8 to 1 stream
12:30	Pb	12:30 5/8 to 1 stream	12:30	Pb	12:30 5/8 to 1 stream
12:40	Pb	12:40 5/8 to 1 stream	12:40	Pb	12:40 5/8 to 1 stream
12:50	Pb	12:50 5/8 to 1 stream	12:50	Pb	12:50 5/8 to 1 stream
13:00	Pb	13:00 5/8 to 1 stream	13:00	Pb	13:00 5/8 to 1 stream
13:10	Pb	13:10 5/8 to 1 stream	13:10	Pb	13:10 5/8 to 1 stream
13:20	Pb	13:20 5/8 to 1 stream	13:20	Pb	13:20 5/8 to 1 stream
13:30	Pb	13:30 5/8 to 1 stream	13:30	Pb	13:30 5/8 to 1 stream
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14:10	Pb	14:10 5/8 to 1 stream	14:10	Pb	14:10 5/8 to 1 stream
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14:30	Pb	14:30 5/8 to 1 stream	14:30	Pb	14:30 5/8 to 1 stream
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15:00	Pb	15:00 5/8 to 1 stream	15:00	Pb	15:00 5/8 to 1 stream
15:10	Pb	15:10 5/8 to 1 stream	15:10	Pb	15:10 5/8 to 1 stream
15:20	Pb	15:20 5/8 to 1 stream	15:20	Pb	15:20 5/8 to 1 stream
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15:50	Pb	15:50 5/8 to 1 stream	15:50	Pb	15:50 5/8 to 1 stream
16:00	Pb	16:00 5/8 to 1 stream	16:00	Pb	16:00 5/8 to 1 stream
16:10	Pb	16:10 5/8 to 1 stream	16:10	Pb	16:10 5/8 to 1 stream
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16:50	Pb	16:50 5/8 to 1 stream	16:50	Pb	16:50 5/8 to 1 stream
17:00	Pb	17:00 5/8 to 1 stream	17:00	Pb	17:00 5/8 to 1 stream
17:10	Pb	17:10 5/8 to 1 stream	17:10	Pb	17:10 5/8 to 1 stream
17:20	Pb	17:20 5/8 to 1 stream	17:20	Pb	17:20 5/8 to 1 stream
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17:50	Pb	17:50 5/8 to 1 stream	17:50	Pb	17:50 5/8 to 1 stream
18:00	Pb	18:00 5/8 to 1 stream	18:00	Pb	18:00 5/8 to 1 stream
18:10	Pb	18:10 5/8 to 1 stream	18:10	Pb	18:10 5/8 to 1 stream
18:20	Pb	18:20 5/8 to 1 stream	18:20	Pb	18:20 5/8 to 1 stream
18:30	Pb	18:30 5/8 to 1 stream	18:30	Pb	18:30 5/8 to 1 stream
18:40	Pb	18:40 5/8 to 1 stream	18:40	Pb	18:40 5/8 to 1 stream
18:50	Pb	18:50 5/8 to 1 stream	18:50	Pb	18:50 5/8 to 1 stream
19:00	Pb	19:00 5/8 to 1 stream	19:00	Pb	19:00 5/8 to 1 stream
19:10	Pb	19:10 5/8 to 1 stream	19:10	Pb	19:10 5/8 to 1 stream
19:20	Pb	19:20 5/8 to 1 stream	19:20	Pb	19:20 5/8 to 1 stream
19:30	Pb	19:30 5/8 to 1 stream	19:30	Pb	19:30 5/8 to 1 stream
19:40	Pb	19:40 5/8 to 1 stream	19:40	Pb	19:40 5/8 to 1 stream
19:50	Pb	19:50 5/8 to 1 stream	19:50	Pb	19:50 5/8 to 1 stream
20:00	Pb	20:00 5/8 to 1 stream	20:00	Pb	20:00 5/8 to 1 stream
20:10	Pb	20:10 5/8 to 1 stream	20:10	Pb	20:10 5/8 to 1 stream
20:20	Pb	20:20 5/8 to 1 stream	20:20	Pb	20:20 5/8 to 1 stream
20:30	Pb	20:30 5/8 to 1 stream	20:30	Pb	20:30 5/8 to 1 stream
20:40	Pb	20:40 5/8 to 1 stream	20:40	Pb	20:40 5/8 to 1 stream
20:50	Pb	20:50 5/8 to 1 stream	20:50	Pb	20:50 5/8 to 1 stream
21:00	Pb	21:00 5/8 to 1 stream	21:00	Pb	21:00 5/8 to 1 stream
21:10	Pb	21:10 5/8 to 1 stream	21:10	Pb	21:10 5/8 to 1 stream
21:20	Pb	21:20 5/8 to 1 stream	21:20	Pb	21:20 5/8 to 1 stream
21:30	Pb	21:30 5/8 to 1 stream	21:30	Pb	21:30 5/8 to 1 stream
21:40	Pb	21:40 5/8 to 1 stream	21:40	Pb	21:40 5/8 to 1 stream
21:50	Pb	21:50 5/8 to 1 stream	21:50	Pb	21:50 5/8 to 1 stream
22:00	Pb	22:00 5/8 to 1 stream	22:00	Pb	22:00 5/8 to 1 stream
22:10	Pb	22:10 5/8 to 1 stream	22:10	Pb	22:10 5/8 to 1 stream
22:20	Pb	22:20 5/8 to 1 stream	22:20	Pb	22:20 5/8 to 1 stream
22:30	Pb	22:30 5/8 to 1 stream	22:30	Pb	22:30 5/8 to 1 stream
22:40	Pb	22:40 5/8 to 1 stream	22:40	Pb	22:40 5/8 to 1 stream
22:50	Pb	22:50 5/8 to 1 stream	22:50	Pb	22:50 5/8 to 1 stream
23:00	Pb	23:00 5/8 to 1 stream	23:00	Pb	23:00 5/8 to 1 stream
23:10	Pb	23:10 5/8 to 1 stream	23:10	Pb	23:10 5/8 to 1 stream
23:20	Pb	23:20 5/8 to 1 stream	23:20	Pb	23:20 5/8 to 1 stream
23:30	Pb	23:30 5/8 to 1 stream	23:30	Pb	23:30 5/8 to 1 stream
23:40	Pb	23:40 5/8 to 1 stream	23:40	Pb	23:40 5/8 to 1 stream
23:50	Pb	23:50 5/8 to 1 stream	23:50	Pb	23:50 5/8 to 1 stream
24:00	Pb	24:00 5/8 to 1 stream	24:00	Pb	24:00 5/8 to 1 stream

COMMENTS: 9:35 until 10:45 water flowing out of pipe
 in water level 1/2 mile down 1/2 mile S.E.


INDUSTRY Automotive Lead DATE 11/28/20

NO. OF MLS PER % FLOW _____ SIZE LINE (in) _____

LOCATION OF SAMPLE POINT Aluminum

SAMPLED BY: 1st SHIFT _____

2nd SHIFT _____

3rd SHIFT _____

[illegible]

1-D-62

PAGE

INDUSTRY NATIONAL LEADDATE 11-28-77

ID. OF MLS PER % FLOW _____

SIZE LINE (in) _____

LOCATION OF SAMPLE POINT _____

SAMPLED BY: 1st SHIFT J. Pruitt

2nd SHIFT _____

3rd SHIFT _____

TIME	FLOW (in)	REMARKS	TIME	FLOW (in)	REMARKS
1900	2-5	S.E. INTO PIPE		10	SW AFTER CHANNEL
	235	SE ALONG WALL	1400	2	SE INTO PIPE
	3-5	SW BEFORE CHANNEL		2	SE ^{S*} ALONG WALL
	0-1	SW AFTER TANK		2	SW BEFORE CHANNEL
	0-1	HOSE INTO TANK 0-1		10	AFTER CHANNEL
	0-1	LAST PT. BEFORE TANK	1500	2	SE INTO PIPE
000	235	SE INTO PIPE		2	SE ALONG WALL
	235	SE ALONG WALL		10	SW BEFORE CHANNEL
	3-5	SW BEFORE CHANNEL		10	SW AFTER CHANNEL
	0-1	SW AFTER TANK 0-1	1600	2	SE INTO PIPE
	0-1	HOSE INTO TANK		2	SE ALONG WALL
100	2	S.E. INTO PIPE		10	SW BEFORE CHANNEL
	2	SE ALONG WALL		10	SW AFTER CHANNEL
	2	SW BEFORE CHANNEL			
	0-1	AFTER TANK			
	0-1	HOSE INTO TANK			
200	2	SE INTO PIPE			
	2	SE ALONG WALL			
	2	SW BEFORE CHANNEL			
*1	11	AFTER CHANNEL (SEE BELOW)			
*2	—	HOSE INTO TANK WAS CUT OFF			
300	2	SE INTO PIPE			
	2	SE ALONG WALL			
	2	SW BEFORE CHANNEL			

REMARKS:

*1 POURED BAGS OF SODA ASH INTO SPILLWAY FROM AMONIA TANK.

*2 CUT OFF HOSE FROM HOLDING TANKS RAN WATER THROUGH HOSE OVER SODA ASH. NO FLOW CAME OVER HOSE FROM AMONIA TANK AFTER THIS TIME.

LOCATION OF SAMPLE POINT At Dead End on Bishop St.

3rd SHIFT

COMMENTS:

INDUSTRY National Lead DATE 1-20-78

NO. OF MLS PER % FLOW Take Ph and GRNB sample SIZE LINE (in) NONE

LOCATION OF SAMPLE POINT on side of Building Facing Railroad Track

SAMPLED BY: 1st SHIFT Allen Franklin

2nd SHIFT _____

3rd SHIFT _____

COMMENTS:

Grabbing 5thly not incl. ball base.
Rail end took did many with with stormsewing
it goes down along the track about 150 yards 3
in a 10" pipe. PAGE 3

INDUSTRY National Lead DATE 4-3-78

NO. OF MLS PER % FLOW GRAB 90mls SIZE LINE (in) _____

LOCATION OF SAMPLE POINT East Side of Building

SAMPLED BY: 1st SHIFT Allyn Franklin

2nd SHIFT _____

3rd SHIFT _____

COMMENTS:

CITY OF ATLANTA
BUREAU OF
WATER POLLUTION CONTROL
INDUSTRIAL WASTE

Company Name Industrial Metals

S. I. C. No. _____

Type Sample _____

Date _____

Samples from 4-7-78
4-11-78

	9/5/78	4/11/78	4-11-78	NATIONAL LEAD #1	N.L.#2	N.L.#3
Source of Sample	INITIAL 4/5	GLASS	GLASS			
Amount of Sample						
Crucible Number						
Wt. Dry (Cru. & Solids)						
Wt. Ig. (Cru. & Solids)						
Wt. of Crucible						
Total Solids in Grams						
Vol. Solids in Grams						
Total Solids p.p.m.						
Vol. Solids p.p.m.						

Color						
Conductivity						
Temp. F						
pH						

5-DAY BIOCHEMICAL OXYGEN DEMAND

Dilution (%)						
Amount of Sample (Ml.)						
Bottle Number						
Immediate D.O.						
Bottle Number						
5 Day D.O.						
5-Day B.O.D.p.p.m.						

CHEMICAL OXYGEN DEMAND

Ml's of Sample						
Ml's of FeSO ₄ Used for Blank						
Ml's of FeSO ₄ Used for Sample						
Normality of FeSO ₄ (NH ₄) ₂ SO ₄						
Chemical Oxygen Demand Mg/l						

METALS (PARTS PER MILLION BY WEIGHT)

Cadmium	2.6	0.2	0.2	.06	1.23	<.02
Chromium	25.4	.06	.33	.02	3.89	<.02
Copper	.12	.10	.04	.08	2.24	<.02
Cyanide						
Nickel						
Silver						
IRON	5.20	4.25	4.00	14.30	57.76	.34
Zinc	.40	.15	.35	.22	5.76	.26
Phenol						
Lead	.64	.76	3.40	1.32	64.8	1.80

INDUSTRY N.I.L. INDUSTRIES DATE 4-7-78

NO. OF MLS PER % FLOW _____ #1 SIZE LINE (in) _____

LOCATION OF SAMPLE POINT FLOW FROM PIPE (?) INTO BOTTOM OF WHERC MIN USED ~~TO~~ TO BE

SAMPLED BY: 1st SHIFT _____

2nd SHIFT _____

3rd SHIFT _____

[illegible]

COMMENTS: pH
Heavy Metals

INDUSTRY N. L. INDUSTRIES DATE 4-7-78

NO. OF MLS PER % FLOW grab 50 # 2 SIZE LINE (in) _____

LOCATION OF SAMPLE POINT FLOW DISCHARGED FROM TROUGH AT SW CORNER
OF PROPERTY

SAMPLED BY: 1st SHIFT _____

2nd SHIFT _____

3rd SHIFT _____

[illegible]

11-D-62

INDUSTRY N.L. INDUSTRIES DATE 4-7-78

NO. OF MLS PER % FLOW grab 50 #3 SIZE LINE (in) _____

LOCATION OF SAMPLE POINT FLOW ENTERING STORM SEWER @ S.E. CORNER OF PROPERTY

SAMPLED BY: 1st SHIFT _____

2nd SHIFT _____

3rd SHIFT _____

[illegible]

COMMENTS: PH
Heavy Metals

INDUSTRY National Lead DATE 6-26-78

NO. OF MLS PER % FLOW Taking Pl SIZE LINE (in) _____

LOCATION OF SAMPLE POINT on sides of Building

SAMPLED BY: 1st SHIFT Allen

2nd SHIFT _____

3rd SHIFT _____

[illegible]

243

I. SEITZINGER'S

- A CREEK (NORTH BRANCH) CLOY w/PH's of 6.
- B CREEK (SOUTH BRANCH) OK CLOY w/PH of 7.
- C CATCH BASIN ON OTHER SIDE OF BATTERY,
CRUSHING OPERATION COMPLETELY STOPPED
UP w/ABOUT 2 1/2' of flow w/A PH READING of
4 & 3 WITH RUNOFF FROM SAME GOING TO
CREEK.
- 4 PH's of 5 & 7 IN M/N.

II NATIONAL LEAD

- A. EAST LINE - CLOY flow w/PH of 6.
- B. WEST LINE TO SEWER - FLOW ENTERING SEWER HAD
PH of 2. Flow from TOP of HILL WAS READING
6. TOTAL flow PH HAD READING of 6 ENTERING
SEWER.
- C. FOUND 12" OR 15" LINE INSIDE LINE GOING
TO SEWER DISCHARGING AMMONIA. ^(w/ fumes) WE
FOUND 'A' PH of 6. DON'T BELIEVE WE
HAD KNOWLEDGE OF THIS LINE PREVIOUSLY.
- D. HAD SMALL pump hooked up BESIDE
AMMONIA TANK TO ALLOW THEM TO DISCHARGE
STRAIGHT FROM TANK TO SPILLWAY
LEADING TO SEWER.
- E. IN M/N IN MECHAN (2) Bldg ST. FOUND PH
of 7.

EXHIBIT
2
ADMITTED
6/12/64
C-78-574

DATE AUG. 17, 1979

SIZE LINE (in)

SAMPLED BY: 1st SHIFT *C. W. Wells*

2nd SHIFT

3rd SHIFT

COMMENTS:

INDUSTRIAL SAMPLING DATA SHEET

INDUSTRY National Lead DATE Aug 17, 1979

NO. OF MLS PER % FLOW	SIZE LINE (in)
10	1/2
20	3/4
30	1
40	1 1/4
50	1 1/2
60	1 3/4
70	2
80	2 1/4
90	2 1/2
100	2 3/4
110	3
120	3 1/4
130	3 1/2
140	3 3/4
150	4
160	4 1/4
170	4 1/2
180	4 3/4
190	5
200	5 1/4
210	5 1/2
220	5 3/4
230	6
240	6 1/4
250	6 1/2
260	6 3/4
270	7
280	7 1/4
290	7 1/2
300	7 3/4
310	8
320	8 1/4
330	8 1/2
340	8 3/4
350	9
360	9 1/4
370	9 1/2
380	9 3/4
390	10
400	10 1/4
410	10 1/2
420	10 3/4
430	11
440	11 1/4
450	11 1/2
460	11 3/4
470	12
480	12 1/4
490	12 1/2
500	12 3/4
510	13
520	13 1/4
530	13 1/2
540	13 3/4
550	14
560	14 1/4
570	14 1/2
580	14 3/4
590	15
600	15 1/4
610	15 1/2
620	15 3/4
630	16
640	16 1/4
650	16 1/2
660	16 3/4
670	17
680	17 1/4
690	17 1/2
700	17 3/4
710	18
720	18 1/4
730	18 1/2
740	18 3/4
750	19
760	19 1/4
770	19 1/2
780	19 3/4
790	20
800	20 1/4
810	20 1/2
820	20 3/4
830	21
840	21 1/4
850	21 1/2
860	21 3/4
870	22
880	22 1/4
890	22 1/2
900	22 3/4
910	23
920	23 1/4
930	23 1/2
940	23 3/4
950	24
960	24 1/4
970	24 1/2
980	24 3/4
990	25
1000	25 1/4
1010	25 1/2
1020	25 3/4
1030	26
1040	26 1/4
1050	26 1/2
1060	26 3/4
1070	27
1080	27 1/4
1090	27 1/2
1100	27 3/4
1110	28
1120	28 1/4
1130	28 1/2
1140	28 3/4
1150	29
1160	29 1/4
1170	29 1/2
1180	29 3/4
1190	30
1200	30 1/4
1210	30 1/2
1220	30 3/4
1230	31
1240	31 1/4
1250	31 1/2
1260	31 3/4
1270	32
1280	32 1/4
1290	32 1/2
1300	32 3/4
1310	33
1320	33 1/4
1330	33 1/2
1340	33 3/4
1350	34
1360	34 1/4
1370	34 1/2
1380	34 3/4
1390	35
1400	35 1/4
1410	35 1/2
1420	35 3/4
1430	36
1440	36 1/4
1450	36 1/2
1460	36 3/4
1470	37
1480	37 1/4
1490	37 1/2
1500	37 3/4

LOCATION OF SAMPLE POINT #2 From pipe side of next to RR

SAMPLED BY: 1st SHIFT Wardo (EAST SIDE TO CREEK)

2nd SHIFT _____

3rd SHIFT 1201

[illegible]

COMMENTS:

CITY OF ATLANTA
BUREAU OF
WATER POLLUTION CONTROL
INDUSTRIAL WASTE

Company Name NATIONAL LEAD CO.

S. I. C. No. _____

Type Sample COMPOSITE

Date 12-17-79

SUSPENDED SOLIDS

Source of Sample					
Amount of Sample					
Crucible Number					
Wt. Dry (Cru. & Solids)					
Wt. Ig. (Cru. & Solids)					
Wt. of Crucible					
Total Solids in Grams					
Vol. Solids in Grams					
Total Solids p.p.m.					
Vol. Solids p.p.m.					

Color					
Conductivity					
Temp. °F					
pH					

5-DAY BIOCHEMICAL OXYGEN DEMAND

Dilution (%)					
Amount of Sample (Ml.)					
Bottle Number					
Immediate D.O.					
Bottle Number					
5-Day D.O.					
5-Day B.O.D.p.p.m.					

CHEMICAL OXYGEN DEMAND

Ml's of Sample					
Ml's of FeSO ₄ Used for Blank					
Ml's of FeSO ₄ Used for Sample					
Normality of FeSO ₄ (NH ₄) ₂ SO ₄					
Chemical Oxygen Demand Mg/l					

METALS (PARTS PER MILLION BY WEIGHT)

X Cadmium	4.66				
X Chromium	<.1				
X Copper	2.6				
X Cyanide	0.2 mg/L				
X Nickel	0.8				
Y Silver	—				
Y Tin	—				
Y Zinc	5.94				
Phenol	—				
X Lead	7.8				

X ^{FE} 3.48

CITY OF ATLANTA
BUREAU OF
WATER POLLUTION CONTROL
INDUSTRIAL WASTE

Company Name N-L-INDUSTRIES

S. I. C. No. _____

Type Sample COMPOSITE

Date 4-16-80

SUSPENDED SOLIDS

	#1		#2		#3
Source of Sample					
Amount of Sample					
Crucible Number					
Wt. Dry (Cru. & Solids)					
Wt. Ig. (Cru. & Solids)					
Wt. of Crucible					
Total Solids in Grams					
Vol. Solids in Grams					
Total Solids p.p.m.					
Vol. Solids p.p.m.					

Color					
Conductivity					
Temp. °F					
pH					

5-DAY BIOCHEMICAL OXYGEN DEMAND

Dilution (%)					
Amount of Sample (Ml.)					
Bottle Number					
Immediate D.O.					
Bottle Number					
5-Day D.O.					
5-Day B.O.D.p.p.m.					

CHEMICAL OXYGEN DEMAND

Ml's of Sample					
Ml's of FeSO ₄ Used for Blank					
Ml's of FeSO ₄ Used for Sample					
Normality of FeSO ₄ (NH ₄) ₂ SO ₄					
Chemical Oxygen Demand Mg/l					

METALS (PARTS PER MILLION BY WEIGHT)

Cadmium <u>Fe</u>	<.1		<.1		14.6
Chromium	0.0		0.0		0.0
Copper	0.12		<.05		<.05
Cyanide					
Nickel	<.1		<.1		0.1
Silver					
Tin					
Zinc	2.26		1.84		2.60
Phenol					
Lead	14.4		3.5		4.0

CITY OF ATLANTA
BUREAU OF
WATER POLLUTION CONTROL
INDUSTRIAL WASTE

Company Name NATIONAL LEAD

S. I. C. No. _____

Type Sample COMPOSITE

Date 5-20-80

SUSPENDED SOLIDS

Source of Sample					
Amount of Sample					
Crucible Number					
Wt. Dry (Cru. & Solids)					
Wt. Ig. (Cru. & Solids)					
Wt. of Crucible					
Total Solids in Grams					
Vol. Solids in Grams					
Total Solids p.p.m.					
Vol. Solids p.p.m.					

Color					
Conductivity					
Temp. F					
pH					

5-DAY BIOCHEMICAL OXYGEN DEMAND

Dilution (%)					
Amount of Sample (Ml.)					
Bottle Number					
Immediate D.O.					
Bottle Number					
5-Day D.O.					
5-Day B.O.D.p.p.m.					

CHEMICAL OXYGEN DEMAND

Ml's of Sample					
Ml's of FeSO ₄ Used for Blank					
Ml's of FeSO ₄ Used for Sample					
Normality of FeSO ₄ (NH ₄) ₂ SO ₄					
Chemical Oxygen Demand Mg/l					

METALS (PARTS PER MILLION BY WEIGHT)

<input checked="" type="checkbox"/> Cadmium	1.04				
Chromium	<0.1				
Copper	0.48				
Cyanide					
Nickel	<0.1				
Iron					
Tin					
Zinc	3.00				
Phenol					
<input checked="" type="checkbox"/> Lead	2.4				

Iron
Form 11-D-61

8.8

0519

INDUSTRY NATIONAL LEAD #1 DATE 10-28-80

NO. OF MLS PER % FLOW _____ SIZE LINE (in) _____

LOCATION OF SAMPLE POINT M/H in Parking Lot

SAMPLED BY: 1st SHIFT _____

2nd SHIFT _____

3rd SHIFT _____

[illegible]

COMMENTS:

PH ONLY

INDUSTRY N.L. Industries #2 DATE _____

NO. OF MLS PER % FLOW _____ SIZE LINE (in) _____

LOCATION OF SAMPLE POINT culvert by RR Tracks

SAMPLED BY: 1st SHIFT _____

2nd SHIFT _____

3rd SHIFT _____

COMMENTS:

INDUSTRY N.L. Ind. #3 DATE _____

NO. OF MLS PER % FLOW _____ SIZE LINE (in) _____

LOCATION OF SAMPLE POINT standpipe in Rear of Building

SAMPLED BY: 1st SHIFT _____

2nd SHIFT _____

3rd SHIFT _____

[illegible]

PAGE

INDUSTRY NATIONAL LEAD #1 DATE 10-30-80

NO. OF MLS PER % FLOW _____ SIZE LINE (in) _____

LOCATION OF SAMPLE POINT Manhole @ corner of Bldg. @ end of parking lot

SAMPLED BY: 1st SHIFT ROBERT & ASTON

2nd SHIFT _____

3rd SHIFT _____

[illegible]

COMMENTS: PH ONLY

INDUSTRY NATIONAL LEAD #2 DATE 10-30-50

NO. OF MLS PER % FLOW _____ SIZE LINE (in) _____

LOCATION OF SAMPLE POINT Orange ditch 7 yds. from corner well near tracks.

SAMPLED BY: 1st SHIFT ROBERT J. ASTON

2nd SHIFT _____

3rd SHIFT _____

[illegible]

COMMENTS:

5: Pft only

Advance payment transferred
 \$25.00 from 3985-62100 now applied
 to 3985-62100
 6/16/81 K-62100-228

01
 OFF-DEL 6.00 JUN 16 1981

READING IN 100 CU. FT.		CONS. IN 100 CU. FT.		1982	READING IN 100 CU. FT.		CONS. IN 100 CU. FT.		1983	READING IN 100 CU. FT.		CONS. IN 100 CU. FT.		1984	READING IN 100 CU. FT.		CONS. IN 100 CU. FT.	
88888	4566	DEC	56674	6166	DEC			DEC										
84322	3365	NOV	50508	6498	NOV			NOV										
80957	3582	OCT	44010	6281	OCT			OCT										
77373	3334	SEPT	37729	5526	SEPT	81591	1444	SEPT										
74021	2570	AUG	32207	6280	AUG	80147	2282	AUG										
71451	1442	JULY	25927	5406	JULY	77865	1202	JULY										
70008	1493	JUNE	20521	5112	JUNE	76663	3089	JUNE										
67515	1654	MAY	15419	5391	MAY	73574	2526	MAY										
66861	1888	APR	10017	6716	APR	71048	2826	APR										
64973	1860	MAR	3302	4710	MAR	68222	3989	MAR										
63113	9965	FEB	98272	4935	FEB	64233	4193	FEB										
58128	5094	JAN	93637	4749	JAN	60840	3366	JAN										
57034	73591											Z	955	0240	00			
LAST READING		LAST CONS.												ACCOUNT NUMBER				

Nat'l Smelting & Refining Co. Inc.
 451 Bishop St. NW
 ATLANTA GA 30318

400 BISHOP ST NW

25' 4" gate

1		COMMERCIAL	2	C26407	001	YES		CC2725 105
NO	IND 5' CHG PER CCF	CUSTOMER CLASSIFICATION	METER SIZE	TAP NUMBER	NO. UNITS	INSIDE CITY	OUTSIDE CITY	METER NUMBER

N/C 7-21-81 0188

READING IN 100 CU. FT.	CONS. IN 100 CU. FT.	1982	READING IN 100 CU. FT.	CONS. IN 100 CU. FT.	1983	READING IN 100 CU. FT.	CONS. IN 100 CU. FT.	1984	READING IN 100 CU. FT.	CONS. IN 100 CU. FT.
340	8	DEC	428	7	DEC			DEC		
332	8	NOV	421	7	NOV			NOV		
334	10	OCT	414	9	OCT			OCT		
314	7	SEPT	405	7	SEPT	496	8	SEPT		
307	5	AUG	398	7	AUG	488	7	AUG		
302	5	JULY	391	7	JULY	481	6	JULY		
297	4	JUNE	384	6	JUNE	475	6	JUNE		
293	3	MAY	378	6	MAY	469	8	MAY		
290	3	APR	372	8	APR	461	8	APR		
287	2	MAR	364	8	MAR	453	7	MAR		
285	4	FEB	356	9	FEB	446	10	FEB		
281	3	JAN	349	7	JAN	436	8	JAN		

00278
LAST READING

00003
LAST CONS.

The Alcoa Smelting & Refining Co., Inc.
 451 Bishop St. N.W. (8)
 AL INDUSTRIES, INC.
 ATLANTA, GA 30318

Z 955 0270 0001
 ACCOUNT NUMBER

451 BISHOP ST NW

3 Lt W

YES		COMMERCIAL	1 1/2	037411	001	YES		007694070
NO	IND B'CHG PER CCF	CUSTOMER CLASSIFICATION	METER SIZE	TAR NUMBER	NO. UNITS	INSIDE CITY	OUTSIDE CITY	METER NUMBER



CITY OF SANTA ANA
BUREAU OF POLLUTION CONTROL
INDUSTRIAL WASTE INSPECTION

☐ Routine
☐ Surcharge
☒ Investigation of Spill
☐ Requested by Industry
☐ Complaint (Source)
☐ Other

Date 11-30-82

Time of Inspection 5:36

Inspector W. Bennett, C. He H. Bryant

I. Industry Information

Name of Industry National Smelting and Refining
Address _____
Telephone _____ SIC Code _____
Basin _____ Acct. No. _____

Contact Person:

☐ Owner
☐ Plant Engineer Robert H. Jones
☐ Plant Manager Chas. E. Hunsaker
☐ Other _____

II. Inspection Information

A. Pretreatment

1. Type of System Holding Tank to adjust P.H.
2. Condition of System Being repaired

B. Special Problems

☐ Surcharge
☐ Spills
☐ Complaints
☐ Other

Description of Problem

Malfunction of probe in Pollution Control Tank causing discharge of ammonia and high P.H.

C. Ordinances Violated 9-5006, 9-5000

D. Recommendations:

III. Follow-up

☐ Form is Official Requisition
☒ Follow-up letter required
☐ Conference needed When _____
☐ Sampling required Grab _____ Composite _____

Additional Comments:

As of this meeting the probe is in the process of being repaired.

Inspector W. Bennett

Plant Official _____

Date 11-30-82

It has been discussed also the need for P.O.T. to correct the problem with the sewer line.

REQ'D BY ✓ APP'D BY XX LOCATION OF SAMPLING POINT(S) XX (1) XX (2) XX (3) SCHEDULED ✓ EMERGENCY XX

COLLECTION DATE 9-19-83 9-20-83 9-21-83 9-22-83 BOTTLE NUMBER 08019 08020 08021 08022 DAILY FLOW VALUES 08019 08020 08021 08022

TYPE SAMPLE: (1) Auto or Manual Discrete or Comp. Bottle Code(s) Installed By Time Installed Checked By Time Checked Removed By Time Removed (2) Grab Sampling Bottle Code(s) Time Collected Grabbed By

LABORATORY TRANSFER: (1) Bottle Code(s) Date Received Time Received Received By (2) Bottle Code(s) Date Received Time Received Received By (3) Bottle Code(s) Date Received Time Received Received By

PARAMETER	CODE	Lab Results (mg/l)							
BOD	A	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COD	A	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SS	A	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
pH (Std U)	A	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Oil & Grease	B	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Phenol	C	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cyanide	D	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Arsenic	E	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cadmium	E	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chromium (T)	E	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Copper	E	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lead	E	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mercury	E	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Nickel	E	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Zinc	E	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chromium (+6)	F	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Chemist Signature Wayne Broughton Date 10/1/83
 *POSSIBLE TOXICITY DUE TO HIGH CONCENTRATION OF LEAD.
 Rec'd By: Gen Date: 10-8-83
 Ent'd By: Gen Date: 10-18-83

WHITE : I & M File
 YELLOW : Laboratory File
 PINK : I & M Control
 CANARY : Laboratory Control

INDUSTRY *National Lead* IND NO. *C77080* SHEET NO. *00029*

[illegible]

	MON	TUE	WED	THUR	FRI	SAT	SUN
COLLECTION DATE	9-19-83	9-20-83	9-21-83	9-22-83			
BOTTLE NUMBER	08019	08020	08021	08022			
DAILY FLOW VALUES							

(note source, readings and units on back of this sheet)

TYPE SAMPLE:

	(A) - (M) (D - C)	(A) - (M) (D - C)	(A) - (M) (D - C)	(A) - (M) (D - C)	(A) - (M) (D - C)	(A) - (M) (D - C)	(A) - (M) (D - C)
(1) Auto or Manual							
Discrete or Comp.							
Bottle Code(s)							
Installed By							
Time Installed							
Checked By							
Time Checked							
Removed By							
Time Removed							
(2) Grab Sampling							
Bottle Code(s)							
Time Collected							
Grabbed By							

LABORATORY TRANSFER:

	D2F	AE	D1F	D1F			
(1) Bottle Code(s)	9/19/83	9/21/83	9/21/83	9/22/83			
Date Received	11:40	11:25	11:25	11:40			
Time Received	NB	NB	NB	NB			
Received By	AE	DF	AE	AE			
(2) Bottle Code(s)	9/20/83	9/20/83	9/22/83	9/23/83			
Date Received	11:45	11:45	11:40	11:25			
Time Received	NB	NB	NB	NB			
Received By							
(3) Bottle Code(s)							
Date Received							
Time Received							
Received By							

[illegible]

REQ'D BY WB APP'D BY ED LOCATION OF SAMPLING POINT(S) N/A on side of Bldg. on main st
 SCHEDULED X EMERGENCY ---

COLLECTION DATE 10-3-83 BOTTLE NUMBER 08003 DAILY FLOW VALUES 08005
 (note source, readings and units on back of this sheet)

TYPE SAMPLE:
 (1) Auto or Manual Discrete or Comp. Bottle Code(s) Installed By Time Installed Checked By Time Checked Removed By Time Removed
 (2) Grab Sampling Bottle Code(s) Time Collected Grabbed By

LABORATORY TRANSFER:
 (1) Bottle Code(s) Date Received Time Received Received By
 (2) Bottle Code(s) Date Received Time Received Received By
 (3) Bottle Code(s) Date Received Time Received Received By

PARAMETER	CODE	Lab Results (mg/l)							
BOD	A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COD	A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SS	A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
pH (Std U)	A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Oil & Grease	B	<input checked="" type="checkbox"/> 14	<input type="checkbox"/>	<input checked="" type="checkbox"/> 17	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Phenol	C	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cyanide	D	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Arsenic	E	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cadmium	E	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chromium (T)	E	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Copper	E	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lead	E	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mercury	E	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Nickel	E	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Zinc	E	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chromium (+6)	F	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Chemist Signature Wayde Broughton Date 10/17/83

White : I & M File Yellow : Laboratory File Pink : I & M Control Canary : Laboratory Control
 Rec'd By: GED Date: 10-18-83
 Ent'd By: GED Date: 10-18-83

Tb

3-21-83 PPM <1.0
 3-29-83 PPM <1.0
 4-6-83 PPM <1.0
 4-11-83 PPM <1.0
 4-12-83 PPM <1.0
 4-13-83 PPM <1.0
 4-19-83 PPM 1.0
 4-22-83 PPM <1.0
 4-25-83 PPM <1.0
 4-28-83 PPM <1.0
 5-6-83 PPM 7.0
 5-10-83 PPM 10.0
 5-17-83 PPM <1.0
 5-20-83 PPM <1.0
 5-23-83 PPM 4.0
 5-27-83 PPM 3.0
 5/30/83 PPM ~~7.0~~ <1.0
 6-6-83 PPM 5.0
 8-29-83 PPM <1.0
 9-6-83 PPM <1.0
 9-19-83 PPM 1.0
 9-22-83 PPM ~~5.0~~ <1.0
 9-26-83 PPM <1.0
 10-6-83 PPM <1.0
 10-14-83 PPM <1.0
 10-26-83 PPM <1.0
 11-16-83 PPM <1.0
 11-21-83 PPM <1.0

Ph 9.1 ✓ 11-30-83 PPM <1.0 Ph 7.8
 Ph 7.7 ✓ 12-15 PPM <1.0 Ph 10.3
 Ph 7.5 ✓
 Ph 8.7 ✓
 Ph 8.5 ✓
 Ph 9.1 ✓
 Ph 7.3 ✓
 Ph 6.8 ✓
 Ph 6.8 ✓
 Ph 7.1 ✓
 Ph 8.3 ✓
 Ph 7.2 ✓
 Ph 7.8 ✓
 Ph 8.5 ✓
 Ph 7.1 ✓
 Ph 7.3 ✓
 Ph 9 ✓
 Ph 7.2 ✓
 Ph 7.8 ✓
 Ph 8.1 ✓
 Ph 7.9 ✓
 Ph 8.8 ✓
 Ph 9.7 ✓
 Ph 7.7
 Ph 8.9
 Ph 6.9
 Ph 7.8
 Ph 7.5

PH RECORDER PUT IN
AT 11:00 AM

PH RECORDER RUNNING PAST 2.0
PH TAPE READING 0.0
PH METER AT CLAY TO READ 1.6

CHECKED AT 12:00
~~PH~~ READING PAST 2.0 PH RECORDER
PH TAPE READING 0.0

CHECKED AT 1:15
~~PH~~ READING PAST 2.0 PH RECORDER
PH TAPE READING 0.0

STARTED SPRINKLING AT 2:00 PM.

PH 0 → 2:00 PM

DYED STREAM OF ~~WATER~~ (IBH)
REDISH BROWN WATER COMING FROM
NATIONAL LEAD, FOUND DYE
COMING THROUGH BUSTED PIPE
IN ATLANTIC STEEL PROPERTY.

CHECKED AT 2:30
READING PAST 2.0
PH TAPE READING 0.0

PH RECORDER TAKEN OUT
AT 2:45 PH STILL ~~0.0~~

APRIL 14th @ GRATE ON M^cCASLIN

NATIONAL LEAD

PH CHECKED IN LAB AT SOUTH RIVER

0230 3.5

0300 3.4

0330 3.3

MEMORANDUM

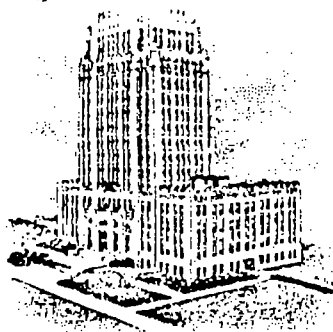
February 1, 1972

TO: Ed Sams
Grover Day

FROM: Bill Burdett

The following pH results were compiled January 31, 1972, from grab samples collected in the 36 inch storm sewer below National Lead Company.

<u>TIME</u>	<u>pH</u>	<u>METHOD USED TO DETERMINE pH</u>
1000	4.4	pH meter at W.P.C. Laboratory
1030	4.0	pH tape in field
1100	0.0	pH tape in field
1130	2.1	pH meter at W.P.C. Laboratory
1300	2.6	pH meter at W.P.C. Laboratory
1330	2.0	pH tape in field
1400	2.7	pH meter at W.P.C. Laboratory
1430	0.0	pH tape in field
1500	1.6	pH meter at W.P.C. Laboratory



CITY OF ATLANTA

DEPARTMENT OF PUBLIC WORKS / INDUSTRIAL WASTE

2640 Jonesboro Road, S.E. / Atlanta, Georgia 30315

February 22, 1972

Mr. W. H. Granger
National Lead Company
400 Bishop Street, N. W.
Atlanta, Georgia 30318

Dear Mr. Granger:

This is to confirm the visit by Mr. Carl Jones and me on February 15, 1972.

At that time, we discussed the damages resulting from the low pH effluent generated by the National Lead battery destruction operation.

Approximately six hundred (600) feet of concrete storm sewer has been severely damaged by the acid waste from this operation. Repairs to the sewer are now underway and the cost of these repairs will be the responsibility of National Lead Company.

Samples collected throughout this month indicate that the pH of the plant effluent runs constantly below the lower acceptable pH limit, as set forth in Chapter 33, Article 1, Section 33-39, Paragraph F, of the City of Atlanta Code of Ordinances. (See Page 4 of booklet enclosed)

The total process flow from the plant now appears to run through a cast iron pipe, the invert of which seems to have been gone for many years.

A check on the flow through this line has given the horrifying results of a pH as low as 0.6 and no higher than 1.7 during two days.

It is essential that immediate temporary corrective action be taken to bring the pH level within our acceptable limits, in order to avoid further sewer destruction within the storm sewer now accepting the industrial effluent.



Area Code 404/ 627-0477

or

627-3030

A plan to permanently abate this illegal discharge must be submitted to the Industrial Waste Section within thirty (30) days from the date of this letter, after plans have been approved, there will be a maximum of thirty (30) days to accomplish the required changes.

I will expect to hear from you within the week in regard to temporary pH control.

Sincerely,

A handwritten signature in cursive script, appearing to read "W. C. Burdett".

W. C. Burdett
Industrial Waste Section
Water Pollution Control Facilities

Enclosure

CC: Ed Sams, Water Pollution Control Division
Charles Lokey, Asst. City Attorney



METAL DIVISION

Atlanta Region

W. D. SMITH
Manager

March 7, 1972

Mr. W. C. Burdett
Industrial Waste Section
Water Pollution Control Facilities
City of Atlanta
2640 Jonesboro Road, S.E.
Atlanta, Georgia 30315

Dear Mr. Burdett:

This will acknowledge receipt of your letter of February 22, 1972 to Mr. W. H. Granger, Superintendent of our plant at 400 Bishop Street, in which you allege damage to a concrete storm sewer due to excessively low pH of plant effluent.

Subsequent to your February 15, 1972 visit, we undertook an extensive investigation of our plant in relation to the storm sewer and the following appears:

Under normal circumstances two (2) types of water are discharged - non-contact cooling water and storm water.

The non-contact cooling water is well within the pH limits prescribed and it is this type of water that is normally directed to Atlanta's storm water sewers by our plant.

Process water - water that comes in contact with raw materials - is not discharged into either of the City's sewerage systems. Rather, it is disposed of in another manner so as to prevent any injurious effect to the sewerage systems.

Thus from the foregoing, it would appear that any water discharged into the sewerage systems could only have had an acceptable pH value.

Box 7008, Station C, Atlanta, Georgia 30309

451 Bishop Street, N.W., Atlanta, Georgia 30318 • (404) 876-7361

Division of N L Industries, Inc.

3/7/72

However, in the course of our investigation it was found there may have been some leakage from our waste collection system that would have mixed with cooling water flowing to the City's storm system.

We find it hard to perceive that the possible leakage when mixed with the cooling water would result in damage to the extent alleged.

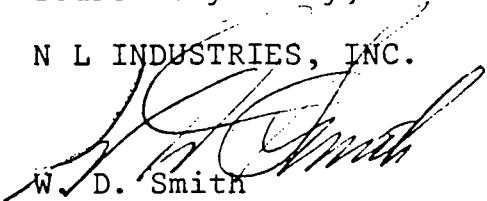
We have stopped the sources of objectionable leakage. Our engineers are presently evaluating alternate concepts of facilities that will eliminate the possibility of objectionable discharges entering the City system. We would expect to complete this evaluation and establish a design plan by May 2, 1972 and will be pleased to present our plans for your review on that date.

In view of the foregoing, we must at this time take under advisement your statements that damage was caused by our discharges, that "cost...of...repairs will be the responsibility of National Lead Company", and that any discharges are "illegal".

We are quite concerned with the allegations you have made and have undertaken the investigation and action as noted above. Please be assured of our sincere efforts to the end that this matter be concluded to the best interests of all concerned.

Yours very truly,

N L INDUSTRIES, INC.



W. D. Smith
Manager

WDS:mat

April 3, 1972

Mr. W. H. Granger
National Lead Company
400 Bishop Street, N. W.
Atlanta, Georgia 30318

Dear Mr. Granger:

This is to advise that repairs to the Bishop Street Storm Sewer, which was damaged by your battery destruction operation, have been completed at a cost of \$5,265.

Pursuant to a letter to you dated February 22, 1972 from Mr. W. C. Burdett of the Industrial Waste Section of the Public Works Department, this is to advise that the cost of these repairs is the responsibility of National Lead Company. Please forward a check payable to the City of Atlanta in the amount of \$5,265 to the undersigned at your earliest convenience.

I am attaching herewith a copy of the requisition to Pressure Concrete Construction Company of Florence, Alabama which authorized this expenditure.

Yours truly,

PELHAM C. WILLIAMS
Director, Public Works Department

PCW:GVP:jm

cc: / Bill Burdett
Charles Lokey, Assoc. City Attorney
George V. Pace

Attachment

Pelham C. Williams

DIRECTOR, PUBLIC WORKS DEPARTMENT

ORDER NO. **6-10** DATE **5-11-41** ORDER NO. **1**

To
 []
 []
 []

0511950
PRESSURE CONCRETE CONSTRUCTION CO.
315 SOUTH SUMMIT ST.
FLORHAM, NEW JERSEY 08630

300 WEST BELL

UNLESS SPECIFICALLY INDICATED ABOVE, ALL ITEMS SHOWN ON THIS ORDER ARE F. O. B. DESTINATION.

QUANTITY	DESCRIPTION	UNIT PRICE	TOTAL	NET DUE 2001 FISCAL YEAR CASH PAID BY CHECK
	REPAIR APPROXIMATELY 950 FEET OF 24 INCH STEEL LINER WITH PNEUMATICALLY APPLIED CONCRETE PLACED IN THE BOTTOM OF THE PIPE FILLING ALL VOIDS WITH FINISHED SURFACE CONFORMING TO THE INSIDE PERIPHERY OF THE PIPE. MIX USED SHALL YIELD A COMPRESSIVE STRENGTH OF 3000 PSI. LOCATION OF WORK BISHOP STREET, N.W. WEST OF MCGALLIN STREET.			
CONFIRMATION				
<small>Use separate invoice for each P.O. Mail invoice in duplicate showing P.O. Number to Dept. of Finance, 501 City Hall.</small>				

THE UNDERSIGNED, BY ACCEPTING THIS ORDER, CERTIFIES
 COMPLIANCE WITH PROVISIONS OF SEC. 31-41-1 OF THE
 CODE OF ORDINANCES OF THE CITY OF ATLANTA STATED
 ON THE BACK OF THIS ORDER.

Must be accompanied by **check** **or** **cash**

PURCHASE ORDER is the Federal Order Form designated Circular number, as assigned
 by the Federal Reserve System Department, and no further exemption is
 necessary. Right is reserved to cancel order if delivery is not made as agreed.
 When specifically designated by the Purchasing Department, this Purchase
 Order will be valid and void in thirty days after above date and any undelivered
 items will be proportionately cancelled at this point.

The undersigned hereby certifies that the **City of Atlanta**, and
 this merchandise is purchased for **public** purposes and is for **the** **use** of **the** **City**.
 Purchasing Agent



METAL DIVISION

Atlanta Region

W. D. SMITH
Manager

June 7, 1972

Mr. P. C. Williams, Director
Public Works Department
City of Atlanta
303 City Hall
Atlanta, Georgia 30303

Dear Mr. Williams:

This will acknowledge receipt of your letter of April 3, 1972 wherein you conclude in substance that, damage to the Bishop Street storm sewer was caused by N L Industries, Inc. Atlanta facility and that, the cost of repairs is the responsibility of N L Industries. Apparently, you have ordered and completed certain repairs since your letter demand the payment of \$5,265.

In our letter of March 7, 1972 to Mr. W. C. Burdett of the Industrial Waste Sections of the Public Works Department, we indicated that we were investigating the allegations of sewer damage, and would take under advisement the allegations as to responsibility for damage and liability for cost for sewer repairs. At this time, we reaffirmed that an investigation into damage and any casual connection is being pursued. However, in view of your letter of April 3, 1972, we must take a stronger position as to responsibility for damage and liability for cost of these sewer repairs. Thus, at this time we must deny any responsibility for damage to the sewer system; nor can we agree to accept liability for the cost of any repairs to the sewer system.

We are at a loss to understand your position in this matter as we at no time entered into a contract with anyone for the repair of sewers. Nor did we authorize the City to act as agent for N L Industries in such a contract. In fact, we were not consulted with the exception of your two (2) letters; thus we find it difficult to perceive how we can be responsible for the repair bill of \$5,265.

Box 7008, Station C, Atlanta, Georgia 30309

451 Bishop Street, N.W., Atlanta, Georgia 30318 • (404) 876-7361

Division of N L Industries, Inc.

Mr. P. C. Williams

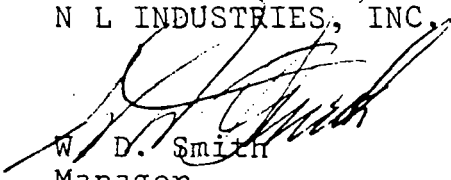
-2-

6/7/72

Perhaps in an attempt to secure a better understanding of the facts in general and the City's reasoning as to our liability for the repairs in particular, we could arrange a meeting with your personnel in interest. If you feel this would be beneficial, please contact us.

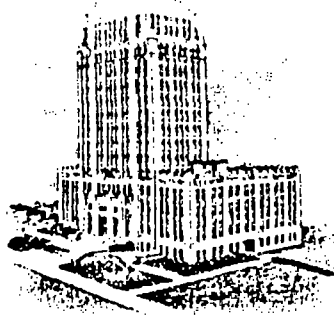
Yours very truly,

N L INDUSTRIES, INC.



W. D. Smith
Manager

WDS:ep



CITY OF ATLANTA

DEPARTMENT OF PUBLIC WORKS / INDUSTRIAL WASTE
2640 Jonesboro Road, S.E. / Atlanta, Georgia 30315

June 23, 1972

Mr. W. D. Smith, Manager
N L Industries, Inc.
Metal Division
Box 7008, Station C
Atlanta, Georgia 30309

Dear Mr. Smith:

Reference is made to your letter dated June 7, 1972, in which you deny any responsibility for damage to the Bishop Street Storm Sewer; nor accept liability for cost of repairs to the sewer.

After considering the damage to the storm sewer and the accrument of evidence, by the Industrial Waste Section, pertaining to the effluent from N L Industries I feel that the Public Works Department has in no way acted prematurely in establishing the responsibility for damage and liability upon N L Industries.

I will have Mr. W. C. Burdett, of the Industrial Waste Section, contact you and arrange a meeting with N L representatives in order to clarify the City's position on this matter.

Sincerely,

Pelham C. Williams
Director, Department of Public Works

CC: Ed Sams, Engineer of Water Pollution Control
CC: W. C. Burdett, Industrial Waste Section
CC: Henry Murff, Claims Attorney

PCW/WCB:jc



Area Code 404/ 627-0477
or
627-3030



METAL DIVISION

Atlanta Region

W. D. SMITH
Manager

July 3, 1972

Mr. W. C. Burdett
Industrial Waste Section
Water Pollution Control Facilities
City of Atlanta
2640 Jonesboro Road, S.E.
Atlanta, Georgia 30315

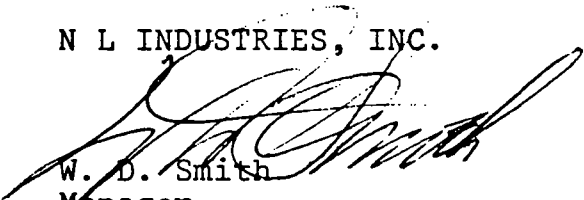
Dear Mr. Burdett:

In accordance with previous conversations and correspondence, we have developed a neutralizing system for handling waste water in our plant and have now received approval to proceed with this installation.

Enclosed is application for industrial sewer connection which your people had advised would be necessary and as soon as this permit is received we will begin installation of this system.

Yours very truly,

N L INDUSTRIES, INC.



W. D. Smith
Manager

WDS:mat

Enc.

August 17, 1972

OFFICE MEMORANDUM

TO: FILE

Dictated by Bill Burdett on August 17, 1972

SUBJECT: Bishop Street Storm Sewer Repairs - City Hall Office
of Water Pollution Control

A meeting was held in Ed Sams office on Thursday August 17, 1972 to review the facts and reasoning for establishing the responsibility and liability for sewer damage on National Lead Industries. Those persons attending this meeting was as follows:

1. W.P.C. Division - Bill Burdett
2. Sewer Division - Ray Allgood
3. City Attorney's Office - Henry Murff
4. N L Industries - Bill Smith
Larry Griffin
Bill Mann
John Stetson

The gist and content of this meeting is outlined as follows:

1. At the outset of the meeting, a plat was introduced showing the location of the subject sewer and the surrounding area. Ray Allgood identified the sewer, its collection points and the point of discharge into the Atlantic Steel pond.
2. Mr. Mann was interested in the length of time the sewer had been in use and if this deterioration was possibly from normal wear. Ray Allgood attested definitely that concrete pipe would wear due to normal friction, but deterioration of the magnitude in this line could have only be caused by a chemical agent. At this time pictures were submitted to illustrate the extent of damage in the line.
3. Mr. Mann posed the question: that possibly there was an industry other than National Lead that might have contributed the damaging waste to the sewer system. I explained that an inspection by the Industrial Waste Section revealed that National Lead was the only industry in the sub-drainage basin, served by the Bishop Street Storm Sewer, that produced waste capable of destroying concrete pipe and that the storm line above the drop inlet where National Lead flow enters the line was in good condition.
4. Mr. Mann requested a more thorough explanation of costs involved in the repair. George Pace was summoned and he explained the procedure followed by the City in acquiring bids for the sewer repair. Eventually awarding the lowest bidder the job.

George also explained that other costs involving work above and beyond normal operations by city crews was involved, but that cost was not included in the \$5,265 statement to National Lead. Mr. Mann agreed that the actual work by the contractor should be the only amount billed.

5. Mr. Mann requested a thirty (30) day period to study and investigate more thoroughly the costs incurred in this type of repair to determine if the City's charge was equitable. September 14, 1972, was set as the final date for a reply by National Lead and the meeting was concluded.

6. I expect National Lead to reply with an offer to pay approximately 60% of the \$5,265 statement submitted. Contending that 40% of the damage was from normal friction wear. Any offer other than the total cost should be flatly rejected.

November 16, 1977

M E M O R A N D U M

TO: File

FROM: Bobby Hadden *REH*

SUBJECT: Inspection of Industrial Discharge at N.L. Industries:

10:15 A.M.

Carl Jones and I went to N.L. Industries to take pictures of sewer damage. We found the following conditions and/or violations of the City code.

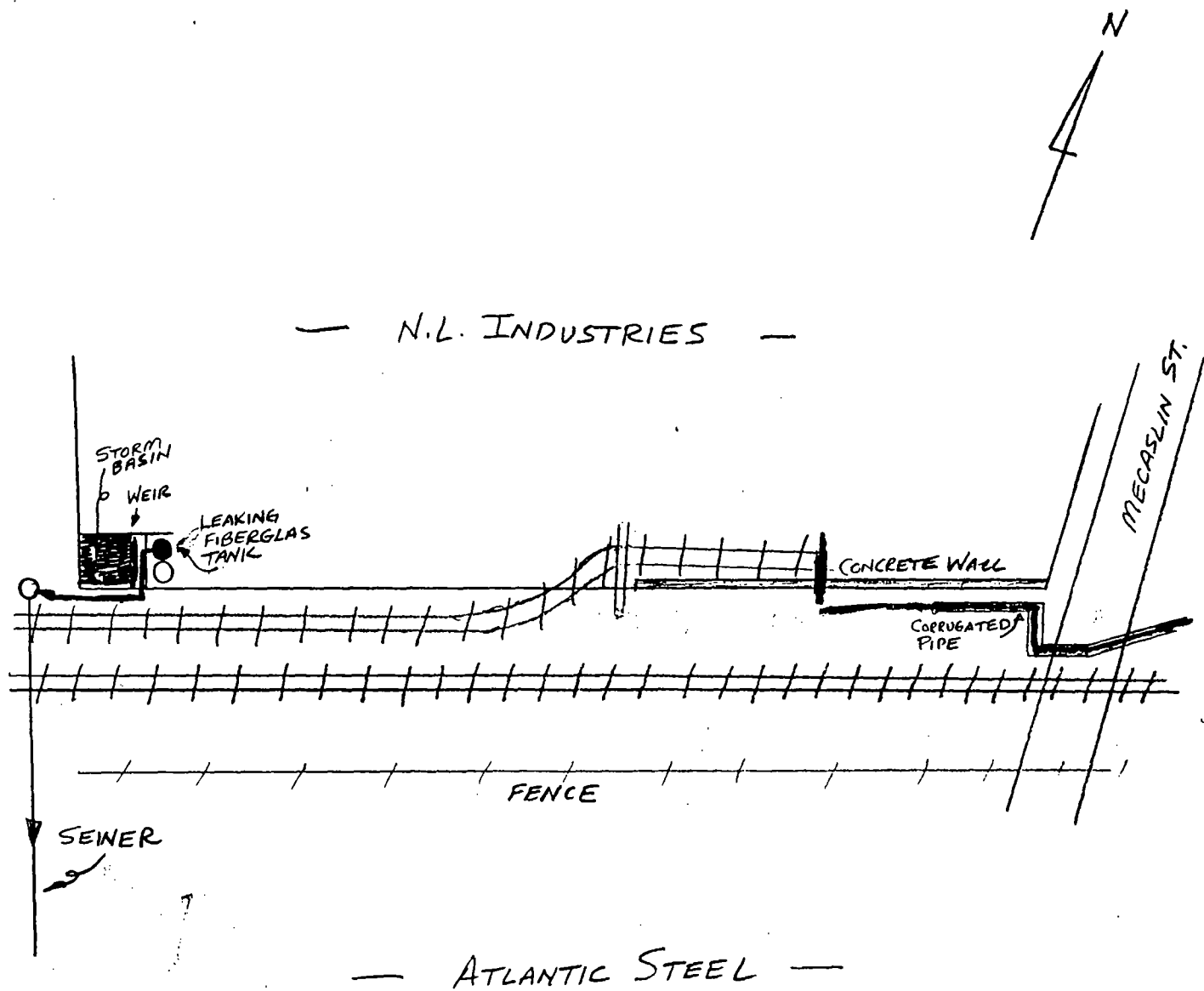
1. pH of ϕ at the discharge pipe located approximately $\frac{1}{2}$ way down concrete wall on southeast side of property. This waste proceeds to corrugated metal pipe into concrete pipe under Mecalvin St. at railroad. Believe these sewers belong to r/r. However, waste eventually ends up in the combined sewer system. Invert of corrugated pipe is completely deteriorated. Before reaching the corrugated pipe, this waste mixes with what appears to be cooling water resulting in a pH of 4.
2. pH of ϕ at the discharge point on the southwest side of their property. This waste was coming from the north fiberglass tank through a leaking pipe joint. Appeared to be residue of sulfuric acid left in tank after rupturing last week. There was approximately 8" - 12" in the bottom. Also the storm basin had a pH of 10, however, this wasn't enough to neutralize the acid. These waste combined in the trough and emptied on the ground and flowed to the manhole at the corner of their property.

Mr. L. H. Malone was informed of conditions. He immediately neutralized the waste in the fiberglass tank with soda ash. He was then going to correct the other discharge.

* Subsequent investigation revealed that this waste eventually discharges into the open channel below the Deering Rd interceptor and does not enter the sanitary sewer. *REH*

N.L. INDUSTRIES
SCHEMATIC OF PROBLEMS

NOV. 16, 1977



PH 0 —
PH 4 —
PH 6 —
PH 10 —

CITY OF ATLANTA

BUREAU OF POLLUTION CONTROL
DIVISION OF INSPECTION AND MONITORING
2440 BOLTON ROAD, N.W.—P.O. BOX 93761 MARTEC STATION
ATLANTA, GEORGIA 30318

November 21, 1977

Mr. L. H. Malone
Area Production Manager
N.L. Industries
Box 7008, Station C
Atlanta, Georgia 30309

Dear Mr. Malone:

This is to confirm our meeting on November 15, 1977, and state the City of Atlanta's position concerning your industrial waste into the sewer system. Others attending were Gary Gorman and Steven Weaver of N.L. Industries and Carl Jones of the City of Atlanta.

Enclosed is a copy of the "Standards of Acceptability of Industrial or Trade Wastes For Admission Into Sewers Of The City of Atlanta." Below is a list of the violations we have found on recent visits:

- (1) The conditions of your pH control system was deplorable. Both fiberglass tanks were ruptured and not serviceable. The pH recorder module was missing from the control panel. Most of the metal piping and valves were badly corroded. (See 33-43 on page 7 of enclosed booklet.)
- (2) On November 11, 1977, we found excessive concentrations of ammonia gases at your "treatment" system and at the city manhole adjacent to your property. There would be no way to enter the sewer without a breathing apparatus and protective clothing. This condition cannot be tolerated as we could have personnel in the sewer for maintenance or inspection. (See Sec. 33-39, paragraph (1) on page 5 of the enclosed booklet.) This excessive ammonia appeared to be a result of over neutralization of the waste in your surface run-off basin as the pH of the waste was 10.
- (3) We also found the following pH violations. (See Sec. 33-39, paragraph (f) on page 4 of the enclosed booklet.)
 - (a) 11-11-77 A.M. - pH of 10 from surface run-off basin into city sewer.
 - (b) 11-16-77 A.M. - pH of 4 being discharged on the southeast corner of your property. This waste enters a city storm sewer and eventually into a stream.



AREA CODE 404/352-1656
352-1657

(c) 11-16-77 A.M. - pH of 0 was being discharged into the city sewer from a leaking valve on one fiberglass tank.

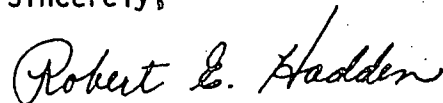
Hopefully the above conditions were corrected following our conversations. However, we feel any immediate action will only be temporary due the overall conditions of your process. Therefore, plans should be submitted to this office for a comprehensive treatment system. We will expect to hear from you before December 16, 1977. Failure to comply will necessitate action as explained in Section 33-35, paragraph c, page 1 of enclosed booklet.

Another area of concern is the surface drainage during a rain event. We intend to monitor the run-off at the next available instance. The storm water flowing to the southeast corner of your property enters a stream tributary to the Peachtree Creek. The State Environmental Protection Division of the Department of Natural Resources has been informed of this run-off as it may be in violation of their laws. The storm water flowing to the southwest corner of your property enters a combination sewer system at the manhole adjacent to your treatment system. Should we find violations of City codes this waste will have to be treated. We understand the surface run-off sump is provided for this purpose, however, we feel the current design will not be sufficient. You will be notified of our findings in the near future.

As explained in our meeting there is damage to the manhole and possibly the sewer line to which you discharge. The City Sewer Maintenance Division will be assessing total damages in the near future. Preliminary investigations indicate that the damages were caused by your operation and if confirmed N. L. Industries will be liable for repair cost.

If you have any questions please call.

Sincerely,



Robert E. Hadden
Industrial Waste Inspector
Division of Inspection & Monitoring
Department of Environment & Streets

REH/jc

CC: Jim Highsmith, Director
Bureau of Pollution Control
City of Atlanta

Grover Day
Sewer Division
City of Atlanta

Don Allen
Environmental Protection Division
Industrial Waste Section
270 Washington St.S.W.
Atlanta, Georgia 30334

CITY OF ATLANTA

BUREAU OF POLLUTION CONTROL
DIVISION OF INSPECTION AND MONITORING
2440 BOLTON ROAD, N.W.—P.O. BOX 93761 MARTEC STATION
ATLANTA, GEORGIA 30318

December 16, 1977

File

Mr. L. H. Malone
N.L. Industries, Inc.
Box 7008, Station C
Atlanta, Georgia 30309

Dear Mr. Malone:

I have reviewed your letter of November 23, 1977 and find that the dates you propose are acceptable; however, recent monitoring data indicates that unacceptable waste is still being discharged. I must insist on complete control of this waste during the planning & construction period, or penalties will be assessed against the company.

Since my letter to you on November 21, 1977, we have checked the waste discharge during storm events. Based on this data almost all of the surface runoff was not within the allowable pH limits. Under present design the sump does not provide adequate treatment during storm events. On each inspection during dry weather we found the sump full, allowing no capacity for storm drainage to be stored and treated. Also, part of your run-off discharges to the east of your property where no treatment is available. Methods to correct these problems could be included in your proposal.

It is essential that your temporary treatment methods provide a waste which does not violate city codes.

If you have any questions please contact me.

Sincerely,

Robert E. Hadden

Robert E. Hadden
Industrial Waste Inspector

REH/jc

CC: Jim Highsmith, Director
Bureau of Pollution Control

Grover Day, Sewer Division

Don Allen, Environmental Protection Division



AREA CODE 404/352-165
352-165





February 2, 1978

Mr. Robert E. Hadden
Industrial Waste Inspector
City of Atlanta
Bureau of Pollution Control
2440 Bolton Road, N.W.
Atlanta, Georgia 30318

Re: N L Industries, Inc.
Atlanta, Georgia Plant

Dear Mr. Hadden:

This responds to your recent letters of November 21 and December 16, 1977. N L has been carefully evaluating the matters you raised and appropriate solutions. I wish to assure you that we plan to improve both the existing waste water treatment system and the collections of potential runoff from the south area of the plant.

At this stage of our review I can confirm that with respect to Ph and ammonia control, NL has already replaced one fiberglass treatment tank with a stainless steel tank and will install an additional stainless steel tank for neutralization and settling of waste water. Automatic controlling devices including a Ph recorder, level controls and automatic controls will be installed in a manner to protect the instrumentation from corrosion and permit adequate maintenance. All level controls, pumps, pipe and valves will be made of acid resistant material to ensure dependability. The system will also be capable of manual operation.

Two 3,000 gallon tanks will be placed to provide additional storage for the treatment collection system. As these collection tanks are filled, waste water will automatically be transferred to the stainless steel treatment tanks for subsequent treatment and disposal.

Metal Division/NL Industries, Inc.

Regional Office & Plant: 451 Bishop Street, N.W., Atlanta, Ga. 30318 Tel. (404) 876-7361

Plant: 6th Avenue & 41st Street, Altoona, Pa. 16602 Tel. (814) 946-1611

Plant: Penns Grove-Auburn Road, Pedricktown, N.J. 08067 Tel. (609) 299-6000

Mr. Robert E. Hadden
Industrial Waste Inspector

-2-

2/2/78

To assure capture of runoff from the plant, NL will install a sump and pumping system in the southeast corner of the plant and a similar sump and pumping system in the southwest corner. Waste waters collected in these sumps will be pumped to the neutralization tank for subsequent treatment if required.

Since the scope of the project and the necessity to install all facilities while the plant continues in operation will require an eight month period, NL respectfully requests the final completion date of September 29th of this year. During the interim period, NL will continue to ensure that the waste waters are properly treated and controlled through carefully monitored and supervised additions of ammonia to the newly installed stainless steel treatment tank.

Attached is a preliminary sketch of the proposed system which will improve our treatment collection capabilities.

Yours very truly,

N L INDUSTRIES, INC.

L. H. Malone
mat

L. H. Malone
Area Production Manager

JW:mat

Enc.



February 27, 1978

Mr. Robert E. Hadden
Industrial Waste Inspector
City of Atlanta
Bureau of Pollution Control
2440 Bolton Road, N.W.
Atlanta, GA 30318

RE: NL INDUSTRIES, INC., ATLANTA, GEORGIA PLANT

Dear Mr. Hadden:

This will confirm our telephone conversation of February 22, 1978 regarding the waste water treatment system and the collection of potential runoff from the south area of the plant.

Subsequent to your review of NL's preliminary plans for the treatment system, you inquired about a review of engineering details. As we discussed, an engineer from the Division and the plant engineer will now start the detailed engineering and design required for this project. As these details become available, NL will provide them to you for review.

The target completion date is September 29th and during the interim period, NL will continue to insure that waste waters are properly treated.

If you have additional questions please call me at (609) 448-3200, Ext. 312.

Very truly yours,

A handwritten signature in cursive script that reads "John W. Wentz".

J. W. Wentz, Manager
TAC & Environmental Control

JWW:cm1



JOE D. TANNER
Commissioner

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

J. LEONARD LEDBETTER
Division Director

March 6, 1978

CERTIFIED MAIL

Mr. L. H. Malone
N. L. Industries, Inc.
Box 7008, Station C
Atlanta, Georgia 30309

Dear Mr. Malone:

This will acknowledge a meeting in your office and subsequent inspection of your plant by Mr. D. R. Allen on January 11, 1978. A sample of the discharge from your property was collected after a period of rainfall on January 6, 1978. Our analysis of that sample revealed that the discharge from your property contained 26 ppm lead and a pH of 2.3. On February 9, 1978, Mr. Allen met with Messrs. Weaver and Dick and collected additional samples of your discharge during dry weather, including separate samples from the discharge pipes at the rear of your property. The results of these analyses will help us to better define the source of the contamination and the quality of the continuous cooling water discharges and will be forwarded to you when available.

The acid collected from the decapping operation and rainfall runoff from the western half of your plant eventually discharges into the City of Atlanta sanitary sewer system. It is our understanding that you are in the process of upgrading the neutralization facilities treating this discharge. Runoff from the eastern half of your plant, as well as some cooling water discharges, enters the drainage ditch behind your property and eventually flows into the Chattahoochee River via Peachtree Creek. This surface runoff from your property, based on the results of the January 6 sample analysis, is contaminated to an unacceptable level and is being discharged in violation of the Georgia Water Quality Control Act and the Rules and Regulations for Water Quality Control (copies enclosed). It appears that the primary source of this contamination is the scrap storage pile where the battery contents are dumped prior to smelting. A significant amount of acid and dissolved lead from the batteries accumulates in this storage pile and is washed off your property by rainfall.

Since the U. S. Environmental Protection Agency has neither promulgated nor proposed effluent guidelines for the secondary lead smelting industry, this office has the legal responsibility of determining effluent limitations for your discharge. This office has maintained a policy of limiting heavy metals in effluents to 1.0 ppm. Accordingly, the following effluent limitations will apply to your discharge:

Lead	1.0 ppm maximum
pH	6-9

Mr. L. H. Malone
N. L. Industries, Inc.
Page 2
March 6, 1978

It will be the responsibility of N. L. Industries to develop and implement a program, acceptable to this office, for complying with these limitations. Significant improvements can be realized by simply allowing more acid to drain into the acid collection tanks in the decapping operation. The city has expressed a willingness to consider diversion of the contaminated runoff to their city sanitary sewer system following pretreatment in your neutralization system. If it is not possible to eliminate the contamination at the source or divert the contaminated runoff to the city system, you must consider treatment of the contaminated runoff for neutralization and lead removal.

It is requested that you submit a schedule and conceptual outline of your plans for eliminating this contaminated discharge within thirty (30) days of receipt of this letter. We would welcome an opportunity to meet with your consultants or staff engineers to discuss this matter and, if you have any questions, please feel free to contact Mr. Allen at 404-656-4887.

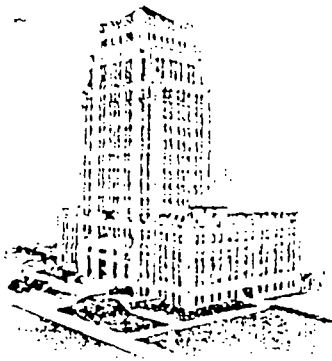
Sincerely,

William M. Jernigan, P.E.
Program Manager
Industrial Wastewater Program

WMJ:dak

Enclosures

✓cc: Bobby Hadden -
City of Atlanta



CITY OF ATLANTA

MAYNARD JACKSON, MAYOR

DEPARTMENT OF ENVIRONMENT AND STREETS

303 CITY HALL

ATLANTA, GEORGIA 30303

(404) 658-6236

April 6, 1978

CHESTER J. FUNNYE, P.E.
Commissioner

Mr. F. M. Roach, Jr. P.E.
Asst. Environmental Engineer
Southern Railway System
Mechanical Department
99 Spring St., S.W.
Atlanta, Ga.

Dear Mr. Roach:

Re: 36" diameter reinforced concrete pipe storm
sewer under Southern's main line track, be-
tween Mecalvin Street and Northside Drive, NW,
Atlanta, Georgia. File 40-15.42

With reference to your letter addressed to Commissioner Funnye, dated March 30, 1978, wherein you requested a statement of the City's position with regard to ownership of the subject storm sewer, please note the following.

Records on file in this office including the following; annual reports, easement files, plat files, field books and cadastral mapping contain no entry or reference to the sewer in question.

You will recall our discussion during our meeting in this office, wherein I pointed out that the area where the sewer is located was annexed into the City of Atlanta under the 1952 Plan of Improvement. Under the terms of the law, which authorized this annexation, it was required that Fulton County forward to the City of Atlanta all records as mentioned above, since our files contain no such records. It appears that Fulton County as well was unaware of its existence.

In February 1972 this department authorized emergency repair to a portion of the sewer in question, including that portion which passes under the railroad's main line track.

The repair was authorized by the City because of the emergency situation, the fact that we had ready access to a contractor having internal repair capability and because National Lead acknowledged responsibility for the damage and agreed to pay the related cost.



Mr. F. M. Roach, Jr. P.E.

Page - 2

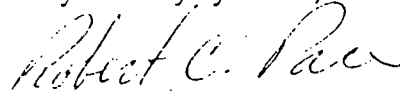
April 6, 1978

Records on file in this office show that payment was made for the cost of the work performed in the amount of \$5,265.00 as previously agreed to by National Lead Incorporated.

The absence of recorded data on file in this office related to the sewer in question indicates that it was placed on railroad property by the railroad and, therefore, would be the responsibility of the railroad.

I trust that this information is that which you were seeking. If we can be of any further help to you in any way, please do not hesitate to call on us.

Very truly yours,



Robert C. Pace
Chief of Sewer Operations Division
Bureau of Highways and Streets

RCP:ctp

cc: Commissioner Chester J. Funnye, P.E.
Mr. Charles Lokey
Mr. Grover Day
Mr. Bill Burdett



JOE D. TANNER
Commissioner

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

J. LEONARD LEDBETTER
Division Director

April 27, 1978

Mr. L. H. Malone
N. L. Industries, Inc.
P. O. Box 70008, Station C
Atlanta, Georgia 30309

Dear Mr. Malone:

This will acknowledge receipt of your letter dated April 18, 1978. We are in agreement with your suggestion to schedule a meeting for the end of June when the detailed engineering design for upgrading your wastewater collection and treatment facilities is completed. However, it is necessary that we review your preliminary engineering concept before the design progresses too far. Copies of the February 2 and February 27 letters to the City of Atlanta were not enclosed in your letter and we have yet to receive any report of your proposal for collecting and treating the contaminated wastewater now being discharged to Peachtree Creek. We would appreciate receiving copies of the letters to the City of Atlanta or a separate letter describing your proposed upgrading.

Listed below are the results of the analyses of samples collected on February 9, 1978.

<u>Sample Location</u>	<u>pH</u>	<u>Total Lead (µg/l as lead)</u>
Apparent groundwater seepage from base of wall near rail- road tracks	3.2	1,950.
Discharge from pipe at base of concrete wall near rail- road tracks	6.6	2,280.
Discharge from pipe near middle of plant property	7.1	1,540.
Discharge to culvert under Mecalvin Street	4.7	4,050.

These analyses show that even the dry weather discharges from your operations have some lead contamination. I trust that the source of contamination and treatment of both dry and wet weather discharges will be addressed in your proposal.

Mr. L. H. Malone
N. L. Industries, Inc.
Page 2
April 27, 1978

We appreciate your cooperation in our pollution abatement program and look forward to receiving the preliminary engineering report as soon as possible.

Sincerely,

Donald R. Allen, Engineer
Industrial Wastewater Program

DRA:bk

cc: ~~Bobby Hadden~~
J. W. Wentz

CITY OF ATLANTA

BUREAU OF POLLUTION CONTROL
DIVISION OF INSPECTION AND MONITORING
2440 BOLTON ROAD, N.W.—P.O. BOX 93761 MARTEC STATION
ATLANTA, GEORGIA 30318

May 3, 1978

Mr. L. H. Malone
N.L. Industries, Inc.
P.O. Box 7008
Station C
Atlanta, Georgia 30309

Dear Mr. Malone:

On April 7, 1978, a composite sample was taken of the industrial waste which discharges into the sanitary sewer on the southwest corner of your property. A concentration of 64 mg/l of lead was found in this sample. The maximum allowable limit is 1 mg/l. This problem should be addressed in your proposal for pretreatment, however, temporary corrections should be taken to bring this in line. Please advise me of the alternatives for temporary action by May 19, 1978.

If you have any questions please call.

Sincerely,

Robert E. Hadden

Robert E. Hadden
Industrial Waste Inspector

REH/jc

CC: James Neal, Superintendent
R.M. Clayton WPC Plant

CC: Jim Highsmith, P.E., Director
Bureau of Pollution Control

John Wentz, Manager
N. L. Industries, Inc.
TAC & Environmental Control

Don Alleh
Environmental Protection Div.
Industrial Waste Section

FOR HIS SAKE



Water Pollution!



AREA CODE 404/352

352



May 15, 1978

Mr. Donald R. Allen, Engineer
Industrial Wastewater Program
Department of Natural Resources
Environmental Protection Division
270 Washington Street, S.W.
Atlanta, Georgia 30334

Re: N L Industries, Inc., Atlanta, Georgia Plant

Dear Mr. Allen:

This is in response to your letter of April 27, 1978, concerning NL's plans to upgrade the wastewater collection and treatment system at the Atlanta plant. Copies of the February 2 and 27, 1978 letters to the City of Atlanta, which were inadvertently omitted from my April 18, 1978 letter, are enclosed.

The preliminary plan for the upgrading includes water collection sumps at the Southeast and Southwest areas of the plant. Wastewaters collected in these sumps will be pumped to a new and automated system for subsequent neutralization and lead removal if required, under both wet and dry conditions. NL is presently preparing detailed plans for this major undertaking and will submit these plans for your review prior to completion of the detailed engineering. We anticipate that these plans will be available in the near future.

Regarding the analytical data contained in the April 27th letter, NL is investigating the sources of the alleged discharges and will perform water monitoring to assist in its investigation.

Metal Division/NL Industries, Inc.

Regional Office & Plant: 451 Bishop Street, N.W., Atlanta, Ga. 30318 Tel. (404) 876-7361

Plant: 6th Avenue & 41st Street, Altoona, Pa. 16602 Tel. (814) 946-1611

Plant: Penns Grove-Auburn Road, Pedricktown, N.J. 08067 Tel. (609) 299-6000

Mr. Donald R. Allen

-2-

May 15, 1978

Please do not hesitate to contact me if you have any further questions in the interim.

Yours very truly,

N L INDUSTRIES, INC.

L H Malone

L. H. Malone
Area Production Manager

LHM:mat

Encs.

cc Mr. Robert E. Hadden
Industrial Waste Inspector
City of Atlanta
Bureau of Pollution Control
2440 Bolton Road, N.W.
Atlanta, Georgia 30318

May 18, 1978

Mr. Robert L. Hadden
Industrial Waste Inspector
City of Atlanta
Bureau of Pollution Control
7440 Bolton Road, N. W.
Atlanta, Georgia 30316

N L Industries, Inc., Atlanta, Georgia Plant

Dear Mr. Hadden:

This is in response to your letter of May 3, 1978 in which you advised NL of a recently-enacted municipal ordinance requiring not more than 1 mg/l of lead in the wastewater effluent of the above-referenced plant.

As John Wentz noted to you in a telephone conversation on May 15, 1978, NL's planned waste acid treatment system will also achieve major reductions of the lead content in the waste stream. NL believes that the 1 mg/l standard can be achieved by installation of this system. However, the precise amount of lead in the effluent cannot be known until the system is operational.

We will be pleased to review this matter along with our detailed construction plans with the appropriate personnel of your department. I want to assure you that NL is moving forward with its comprehensive project as expeditiously as possible.

Very truly yours,



L. H. Malone, Plant Manager

LHM:vm

Metal Division/NL Industries, Inc.

Regional Office & Plant: 451 Bishop Street, N.W., Atlanta, Ga. 30318 Tel. (404) 876-7361

Plant: 6th Avenue & 41st Street, Altoona, Pa. 16602 Tel. (814) 946-1611

Plant: Penns Grove-Auburn Road, Pedricktown, N.J. 08067 Tel. (609) 299-6000

FILE IN
TIONAL LEAD
FILE



JOE D. TANNER
Commissioner

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION

270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

J. LEONARD LEDBETTER
Division Director

August 18, 1978

Mr. John Wentz, Manager
TAC & Environmental Control
N. L. Industries, Inc.
P. O. Box 3618
Hightstown, New Jersey 08520

Re: N. L. Metals
Atlanta, Georgia

Dear Mr. Wentz:

This will acknowledge receipt of the two flow diagrams for the proposed wastewater collection and treatment system at your Atlanta, Georgia plant and confirm your subsequent telephone conversation with Mr. D. R. Allen on August 4, 1978. It is our understanding that all wastewater and runoff from the collection and treatment system will be pumped to the City of Atlanta sanitary sewer system and that duplex pumps will be provided in the two sumps shown on the drawings.

The drawings make no reference to the lead contaminated discharges noted in Mr. Allen's letter to Mr. Malone dated April 27, 1978. In Mr. Malone's response of May 15, 1978, he indicated that these discharges would be monitored to determine the source of contamination. The results of our sampling indicate that these discharges will need pH neutralization, for one discharge only, and removal of lead by treatment or source control.

It is requested that the final engineering drawings for your proposed system be forwarded to our office for review as soon as they are available.

Sincerely,

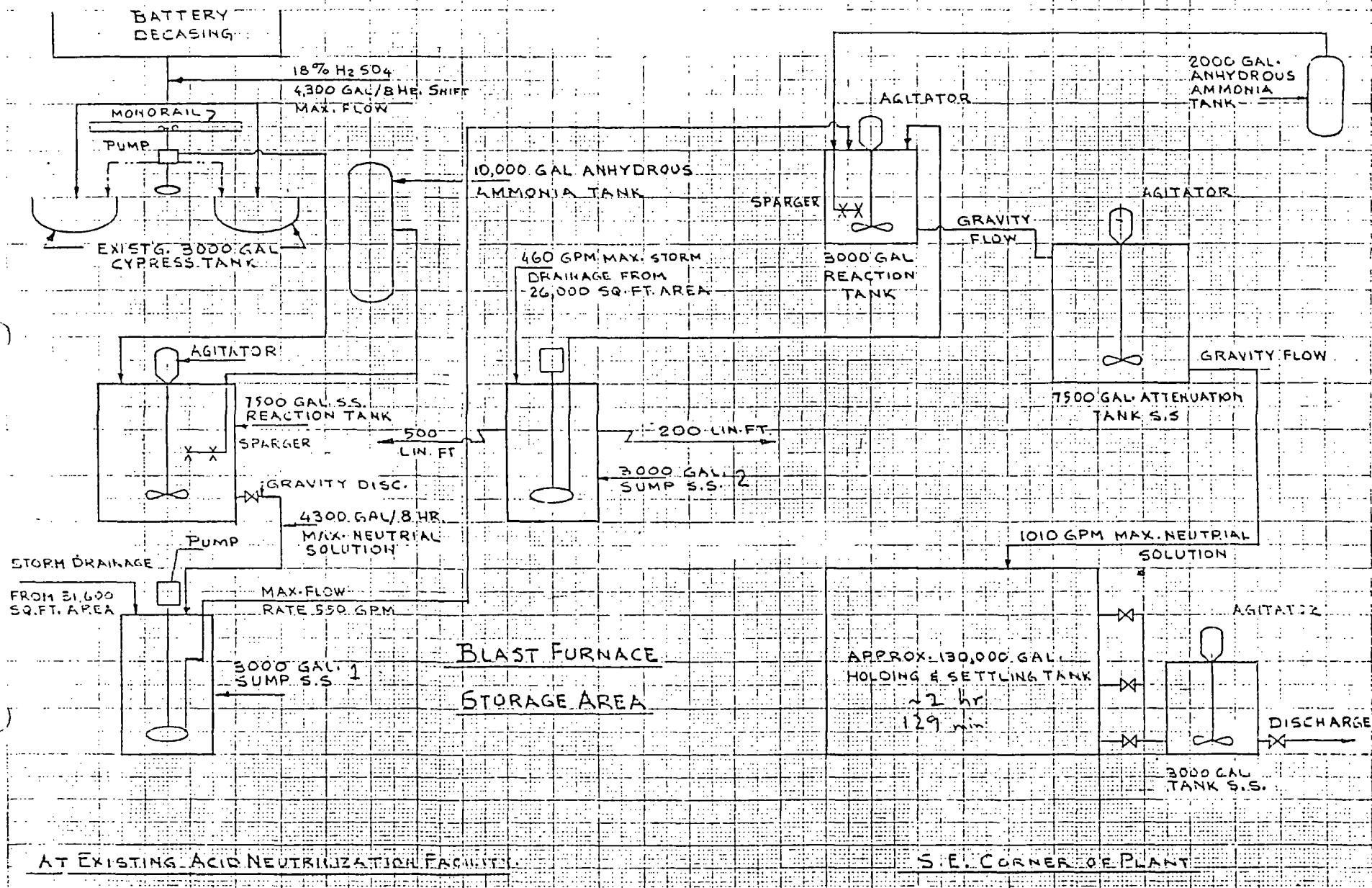
William M. Jernigan, P.E.
Program Manager
Industrial Wastewater Program

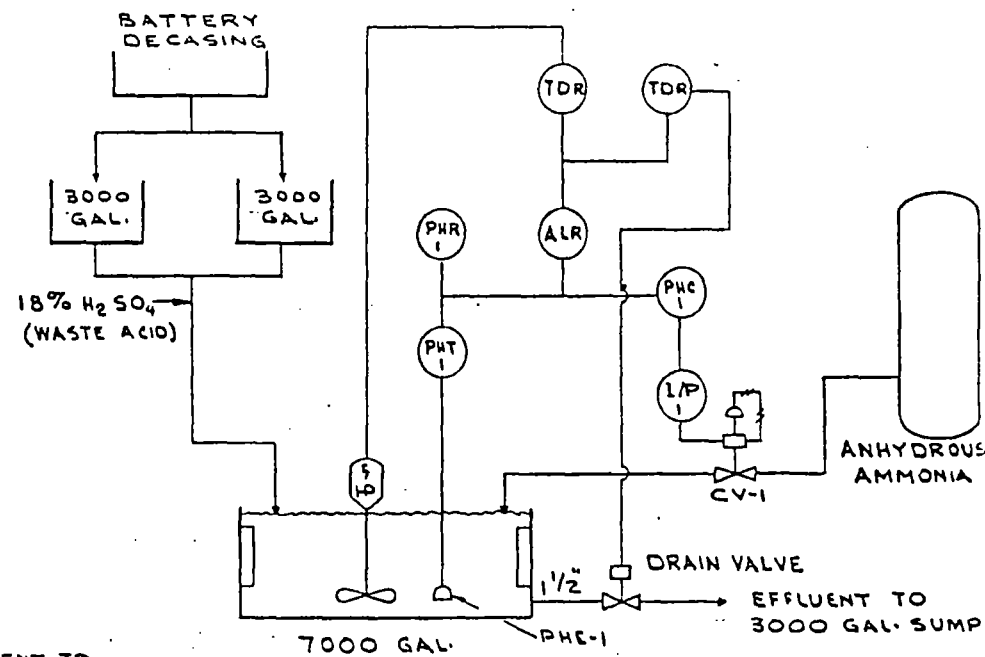
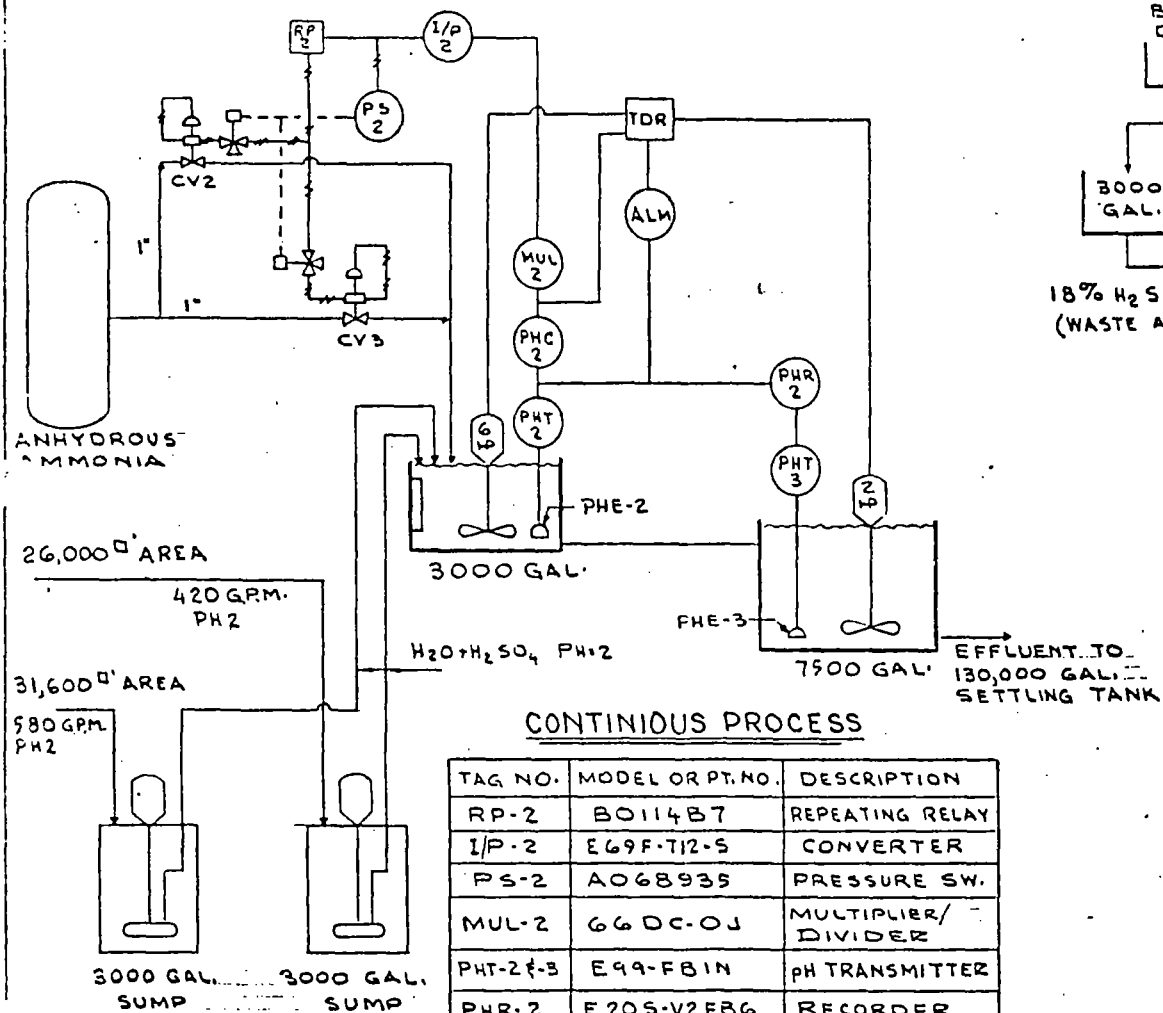
WMJ:dak

cc: Robert E. Hadden
L. H. Malone

Bobby -
I've attached flow diagrams we received.
Don

WATER RUN OFF COLLECTION & TREATMENT. ATLANTA, GA.





NL Metals



December 14, 1978

Mr. R. E. Hadden
Department of Environment & Streets
Bureau of Pollution Control
Division of Inspection & Monitoring
City of Atlanta
P. O. Box 93761 - Martec Station
Atlanta, Georgia 30318

Dear Mr. Hadden:

Per our discussion today enclosed herewith is application for Industrial Sewer Connection. Drawings, specifications, and other items referred to as exhibits on the enclosed application are already in your possession. I will submit our plans for monitoring total discharge flow through the treatment system to you for your approval prior to installation of any flow monitoring equipment.

Thanks for the courtesies extended to Mr. Malone and myself during our visit to your office this morning. If you desire any further information relative to the collection and treatment of liquid effluent at our Atlanta, Georgia Plant, please let me know.

Sincerely,

N L INDUSTRIES, INC.

Robert M. Wilson

Robert M. Wilson,
Engineering Supervisor
Metal Division

RMW:mat

Enc.

No. _____

INDUSTRIAL SEWER CONNECTION APPLICATION

To the City of Atlanta, Georgia

The undersigned being the N L Industries, Inc. of the property
(Owner, Lessee, Tenant, etc.)

located at 430 Bishop Street, N.W., Atlanta, Georgia

does hereby request a permit to use an industrial sewer connection
(install, use)

serving the N L Industries Atlanta Plant, which company is
(Name of Company)

engaged in Secondary Lead Smelting and Refining

at said location.

1. A plat of the property showing accurately all sewers and drains now existing is attached hereunto as Exhibit "A".

2. Plans and specifications covering any work proposed to be performed under this permit is attached hereunto as Exhibit "B".

3. A complete schedule of all process waters and industrial wastes produced or expected to be produced at said property, including a description of the character of each waste, the daily volume and maximum rates of discharge, and representative analyses, is attached hereunto as Exhibit "C".

4. The name and address of the contractor who will perform the work covered by this permit if available.

Superior Steel Fabricators, Inc.

4871 Highway 85, Forest Park, Georgia

CITY OF ATLANTA

BUREAU OF POLLUTION CONTROL
TECHNICAL SERVICES BRANCH
2440 BOLTON ROAD, N.W.—P.O. BOX 93761
ATLANTA, GEORGIA 30377-0761

December 21, 1982

M E M O R A N D U M

TO: FILE

FROM: CLIFFORD S. ICE

RE: SPILL - NATIONAL SMILTING AND REFINING (NATIONAL LEAD)

On November 30, 1982 at 9:30 A.M., Inspectors Michael Godbey, Harriet Bryant, and myself, Clifford Ice, responded to a "Spill Complaint" at National Smilting and Refining (Nat. Lead). This complaint was given to me by Bobby Hadden, Chief of Inspection & Monitoring. At his recommendation, I contacted Ms. Jillie Rackley (EPD) and Mr. Jim Cook of Emergency Management (659-6257) to get more background information.

Repaired
Mr. Cook of Emergency Management related that a strong ammonia odor was reported to the Fire Department coming from the area of Deering Road and Loring Drive on the night of November 29, 1982. Ms. Rackley (EPD) concurred with this report, adding also that a high pH was present. Further investigation by Ms. Rackley revealed that National Smilting and Refining was the source. After investigation by National Smilting of their facilities, it was found that a malfunctioning probe was causing excess amounts of ammonia to be discharged. As a result of this finding, Ms. Rackley advised National Smilting to immediately cease discharging their industrial waste.

Repaired
Upon our arrival on the morning of November 30, 1982, we found the holding tank to be overflowing and draining into the storm drain. This was further compounded by occasional rain falling into the open tank. We also found the sanitary sewer to which National Smilting discharged to be pouring directly into the storm drain at Deering and Loring. This line should have been discharging into the Deering Road interceptor. *why?*

After much discussion by Waldo Bennett, Ms. Rackley and officials of National Smilting, it was decided that National Smilting should continue to retain their discharge of industrial waste until a working probe was installed and the sewer line repaired.



AREA CODE 404/352-1656

By the afternoon of December 1, 1982, the ammonia discharge was corrected and the sewer line repaired by DOT.

CSI/cc

CITY OF ATLANTA

MAYNARD JACKSON, MAYOR

BUREAU OF POLLUTION CONTROL
DIVISION OF INSPECTION AND MONITORING
2240 BOLTON ROAD, N.W.—P.O. BOX 93761
ATLANTA, GEORGIA 30318

November 17, 1983

H.G. Granger
National Smelting Co.
430 Bishop Street, N.W.
Atlanta, Georgia 30318

Dear Sir:

On 9/19,20,21,22/1983 the Industrial waste discharge
to the sewerage system from National Smelting Co.
was sampled in compliance with Section 9-5020 of the Atlanta City Code.

The following results are averages of the lab tests from the days shown
above:

1. TSS - 71 above normal sanitary waste.
2. BOD - 0 above normal sanitary waste.

Based on these results, the Industrial Waste Surcharge per 100 cubic feet
of water returned to the sewer is \$ 0.079. This charge went into effect
on the water billing cycle that began September 28, 1983.

If you have any questions, please contact Clifford Ice at 352-1656.

Respectfully,



Clifford Ice
Industrial Waste Inspector

FOR HIS SAKE

Water Pollution!



AREA CODE 404/352-
352-1

CITY OF ATLANTA

BUREAU OF POLLUTION CONTROL
TECHNICAL SERVICES BRANCH
2440 BOLTON ROAD, N.W.—P.O. BOX 93761
ATLANTA, GEORGIA 30377-0761

December 15, 1983

Mr. Ripwinkles
National Smelting Company
430 Bishop Street, N.W.
Atlanta, Georgia 30318

Dear Mr. Ripwinkles:

The enclosed Sampling Data Sheet will highlight several areas of concern that need to be addressed. Circled under Lab Results are the Cyanide and Lead concentrations. The Cyanide concentrations are high for 9/19/83 and out of limits for 9/22/83. The lead concentrations are out of limits from 9/19/83 to 9/22/83. The maximum daily allowable concentrations for these parameters are stated on page 9, Section 9-5008(b) of the City of Atlanta Water Pollution Control Ordinance, titled Limitations on Wastewater Strength.

Mr. Ripwinkles, it is important that we make plans to discuss these violations as soon as possible. The above dates reflect your effluent as of September. It is important however that this is not the case presently.

I will be waiting to hear from you by December 20, 1983. I can be reached at 352-1656.

Respectfully,



Clifford S. Ice
Industrial Waste Inspector



AREA CODE 404/352-1656

Section 9-5008 Specific Pollutant Limitations

- (a) Criteria to Protect the Treatment Processes and Receiving Water Quality. The maximum levels listed below are selected to protect the water pollution control facility and to protect receiving water quality. Discharges by users of the collection and treatment systems are limited such that specific pollutants at the influent to the water pollution control facilities do not exceed concentrations specified below.

<u>POLLUTANT</u>	<u>MAXIMUM DAILY CONCENTRATION, mg/l</u> <u>(24 hour Composite)</u>
Arsenic	0.1
Cadmium	0.04
Chromium (+6)	0.2
Chromium (total)	1.2
Copper	0.5
Cyanide	0.34
Phenol	0.6
Lead	0.5
Mercury	0.004
Nickel	0.25
Zinc	1.0

- (b) Limitations on Wastewater Strength. No person or user shall discharge wastewater at such concentration or mass as to cause the influent to the water pollution control facility to exceed the limits listed in subsection (a) of this section. The limits on process discharges by the user listed below may be used as a guide in design and plant control, but may be altered by the Commissioner in the event of a discharge causing the influent to the water pollution control facility to exceed the specified limits of subsection (a) of this section or causing interference with water pollution control facilities. Allowable pollutant levels are provided as concentration limits and, for industrial users having discharges of less than 10,000 gallons per day (gpd), as mass limits.

<u>POLLUTANT</u>	<u>MAXIMUM DAILY ALLOWABLE</u> <u>CONCENTRATION, * mg/l</u> <u>(24 hour Composite)</u>	<u>MAXIMUM ALLOWABLE</u> <u>MASS, * lbs/day, DISCHARGE</u> <u>UNDER 10,000 GPD ONLY</u>
Arsenic	1.0	0.083
Cadmium	1.2	0.100
Chromium (+6)	1.5	0.125
Chromium (total)	13.0	1.084
Copper	4.5	0.375
Cyanide	4.0	0.334
Phenol	15.0	1.251
Lead	4.0	0.334
Mercury	0.05	0.004
Nickel	4.0	0.334
Zinc	4.5	0.375

* As measured in discharge from manufacturing processes only, excluding domestic wastes or unpolluted discharges.

LAKE ENGINEERING AND DEVELOPMENT, INC.

6000 LAKE FORREST DRIVE

SUITE 350

ATLANTA, GEORGIA 30328

TELEPHONE: (404) 257-9634

MICHAEL L. SAPPINGTON, PRESIDENT

January 3, 1984

Mr. Clifford S. Ice
City of Atlanta
Bureau of Pollution Control
P.O. Box 93761
Atlanta, Georgia 30377

Dear Mr. Ice:

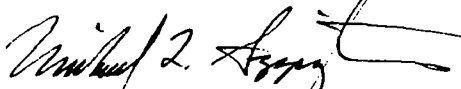
I have interviewed the operating personnel at National Smelting and Refining Company, Inc. in order to try to determine the cause of the high lead results detected by the City of Atlanta during your recent sampling. Apparently sludge was being removed from the final polishing tank just prior to or during the sampling which began on September 19, 1983. Apparently a small amount of sludge was spilled into the sewer causing the elevated readings you encountered. NSR's sampling of the discharge tank revealed a lead level of 1.0 mg/l on September 19 and <1.0 mg/l on September 22, (results attached).

Sludge is only removed from the tank about once a year. The treatment plant operator has been instructed to make certain no sludge is spilled into the discharge tank in the future. Hopefully, this practice will insure that no further discharges will occur which are out of limits with applicable standards.

Please contact me if you have further questions in this matter.

Sincerely,

for National Smelting & Refining, Inc.
LAKE ENGINEERING & DEVELOPMENT, INC.



Michael L. Sappington, P.E.
President

MLS/sas

CITY OF ATLANTA

BUREAU OF POLLUTION CONTROL
DIVISION OF INSPECTION AND MONITORING
2440 BOLTON ROAD, N.W.—P.O. BOX 93761
ATLANTA, GEORGIA 30377-0761

January 10, 1984

Mr. Ripp Winkles
National Smelting Company
430 Bishop Street, N.W.
Atlanta, Georgia 30318

Dear Mr. Winkles:

I have received from Mr. Michael Sappington, President of Lake Engineering and Development, sample results taken from your discharge tank. These results are appreciated, however, they do not verify that sludge removal from the final polishing tank actually was the source that caused the high Lead and Cyanide concentrations for the period in question.

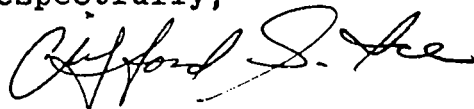
Please send to me the following information:

1. the exact dates of sludge removal,
2. the company responsible for sludge removal,
3. amount of sludge removed,
4. location of where sludge was taken,
5. future dates of sludge removal.

This information should be submitted to this office every six months. It is important that this information is received by January 27, 1984. Resample consideration is dependent on this information.

I am looking forward to your continuing cooperation in assuring that the best possible representative sample can be taken of your effluent.

Respectfully,



Clifford S. Ice
Industrial Waste Inspector



AREA CODE 404/352-1656
352-1657

CITY OF ATLANTA

BUREAU OF POLLUTION CONTROL
DIVISION OF INSPECTION AND MONITORING
2440 BOLTON ROAD, N.W.—P.O. BOX 93761
ATLANTA, GEORGIA 30377-0761

February 1, 1985

Mr. David F. Cook, Vice President
National Smelting & Refining Company, Inc.
451 Bishop Street, N.W.
Atlanta, Georgia 30381

Dear Mr. Cook:

Enclosed is the proposed wastewater discharge permit for your facility at 451 Bishop Street, N.W. If you agree with the terms of the permit, sign the last page and return to me. Should you disagree, respond accordingly. Your response must be received by this office on or before February 15, 1985.

If I can provide additional information or service, please call.

Sincerely,

Robert E. Hadden

Robert E. Hadden, Chief
Division of Inspection & Monitoring



AREA CODE 404/352-1656
352-1657



**NATIONAL
SMELTING**

THE NATIONAL SMELTING AND REFINING COMPANY, INC., 451 BISHOP STREET, N W, ATLANTA, GA 30381 • 404/876-7361
TELEX NO. 54-2870

215185

Mr. Robert E. Hadden, Chief
Division of Inspection and Monitoring
Atlanta Bureau of Pollution Control
P.O. Box 93761
Atlanta, GA 30377-0761

Dear Mr. Hadden:

We have received a draft copy of the wastewater discharge permit transmitted by your letter dated February 1, 1985. We wish to comment on certain provisions and conditions of the draft permit and request that issuance of the permit be stayed until these matters can be discussed and resolved. Our comments are given in the following paragraphs.

Part II Schedule of Compliance

Item D of this part states the following:

On or before March 9, 1987, comply with the limitations of the Federal Pretreatment Standards for Nonferrous Metals Point Source Category. However, should the limitation provided in Paragraph C be more stringent, then the most stringent is the applicable limitation. A schedule of compliance in accordance with Section 9-5025(b) of the City ordinance must be submitted to this office within 60 days of the effective date of this permit.

Pollutant Limitations (PSES - Battery Cracking) (1)

<u>Parameter</u>	<u>Maximum for any one day</u>	<u>Maximum for monthly average</u>
Antimony	1.299	0.579
Arsenic	0.936	0.384
Lead	0.189	0.087
Zinc	0.687	0.283
Ammonia (asN)	0.000	0.000

(1) Units: Mg/kg (pounds per million pounds) of lead scrap produced.

The pollutant limitations specified under item D are presently being litigated in the U.S. Court of Appeals, Fourth Circuit, Document No. 84-1659, entitled, "The Secondary Lead Smelters Association, Inc., Petitioner v. William D. Ruckelshaus, et al." Therefore, any reference in the permit to the federal pretreatment standards for the Nonferrous Metals Point Source

Mr. Robert E. Hadden, Chief
February 15, 1985
Page Two

Category should include a statement indicating that the pollutant limitations are contingent upon the outcome of the court case.

We also wish to contest the inclusion of an ammonia limitation of zero in the draft permit conditions. Our entire wastewater pretreatment system is designed, constructed and operated based on the use of ammonia as the neutralizing agent. The requirement for no discharge of ammonia would require a costly redesign and retrofit of the entire system. Therefore, we request that the ammonia limitations be deleted.

In accordance with the comments stated above, we request that item D be reworded as follows:

D. On or before March 9, 1987, comply with the limitations of the Federal Pretreatment Standards for Nonferrous Metals Point Source Category in accordance with the resolution of Document No. 84-1659, U.S. Court of Appeals, Fourth Circuit, "Secondary Lead Smelters Association, Inc., Petitioner, v. William D. Ruckelhaus, et al." However, should the limitation provided in Paragraph C be more stringent, then the most stringent is the applicable limitation. A schedule of compliance in accordance with Section 9-5025(b) of the City ordinance must be submitted to this office within 60 days of the effective date of this permit.

Pollutant Limitations (PSES - Battery Cracking) (1)

<u>Parameter</u>	<u>Maximum for any one day (2)</u>	<u>Maximum for monthly average (2)</u>
Antimony	1.299	0.579
Arsenic	0.936	0.384
Lead	0.189	0.087
Zinc	0.687	0.283

(1) These limitations are subject to change pending the resolution of current litigation.

(2) Units: mg/kg (pounds per million pounds) of lead scrap produced.

We also would like to request that the method for obtaining the weekly lead sample be changed from 24 hour composite to either a grab sample or a one hour composite. This is due to the fact that we normally only discharge for one or two hours a day.

Mr. Robert E. Hadden, Chief
February 15, 1985
Page Three

We certainly appreciate your consideration of these comments. Please contact me if further information or discussions are needed.

Sincerely,

NATIONAL SMELTING & REFINING CO., INC.

A handwritten signature in cursive script, reading "Allan P. Fields", followed by a short horizontal line.

Allan P. Fields
Vice President

APF/sas



CITY OF ATLANTA

121 MEMORIAL DRIVE - ATLANTA, GEORGIA 30335

404 - 658-7175

ANDREW YOUNG
MAYOR

DEPARTMENT OF WATER
AND POLLUTION CONTROL
FREDERICK T. ARTIS
Commissioner

BUREAU OF POLLUTION CONTROL
GEORGE D. BARNES, P.E.
Director

February 25, 1985

Allan P. Fields, Vice President
National Smelting and Refining Company
451 Bishop Street, N.W.
Atlanta, Georgia 30381

Dear Mr. Fields:

I am responding to your letter to Mr. Robert Hadden regarding your permit.

Your comments concerning the limitation being under litigations is well taken but have very little bearing in the issuing of this permit.

We cannot issue you a permit based on the possible outcome of these proceedings and be in compliance ourselves; for the City itself, must be in compliance as well as industry.

The limits set forth in your permit are established rules and regulations by EPA and until those rules are changed, we have no alternative. If and when these limitations are changed, we in return will be more than happy to change or reissue your permit accordingly. Item D then cannot be reworted.

The limit of (0.000) on ammonia (asN) is also a limit established by EPA and until that is changed by EPA, we cannot change that limitation. Therefore, we cannot delete the ammonia limitation.

The limitations standards are set on daily limits (24 hrs); a 24 hr. composite is the only way to determine whether or not you are in compliance with the required limits.

If your discharge is only for a 2' hour period per day, then you can only composite for 2 hours, but if there is discharge of 10 or 15 minutes throughout the day, your composite is from all of the periods through the day.

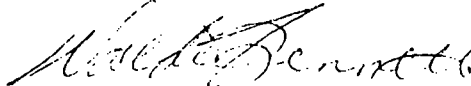
The compliance schedule submitted in your baseline report is unacceptable and a new one must be submitted by March 25, 1985.

Please remember that the compliance date still remains March 9, 1987 and until that date is changed, there is nothing we can do.

A schedule of compliance must be submitted to meet that date.

Thanks in advance for your cooperation.

Yours truly,

A handwritten signature in cursive script, appearing to read "Waldo Bennett".

Waldo Bennett
Permitting & Computer Management Inspector
Division of Inspection & Monitoring
2440 Bolton Road, N.W.
Atlanta, Georgia 30318